

EPA Reg. No. 75174-4

reviewer
rec'd
11/22

11/29 - reviewer
had conflicting
Dr. appt.

presented to PRIA group: 12/1/05

received:

CSF (list different pH, flash point, density from
labels (name + address of producer has changed) (calculations on
cover letter CSF do not match)
application for pesticide last nor agree w/
data comp form for generic data label)
chemistry data + self certification

Fee for Service
75174-U
SIS 7200

D. 362263 fee paid?
S786185 yes 12/2/05
\$1050
A53

intent:

register product which was canceled due to non-
payment of maintenance fees: 75174-1

12/1/05 left
message requesting
these items
call Donna
for additional
forms.
spoke with her
12/1/05 - she
will fax
info to me
soon (tonight)

Concern: does label + CSF match old product
75174-1 ?

if so do we need to review chemistry data again? send to review
we need data matrix which lists all of the data submitters
(generic) as well as a product specific
matrix and data comp form.

Put chemistry data into review → sent to review
on 12/2/05

pin punch date: 11/2/05

Donna
Wooden
770 513
39000

as of
11/28 fee
not paid

~~tentative start:~~
~~11/23/05~~
12/2/05

~~tentative due:~~
~~2/2/06~~
~~3/2/06~~
1st renegotiation → 6/2/06

11/6/06 spoke w/ Donna Wooden - she will fax 2 corrected product
specific data matrix pages (2 of 3)
11/20/06 revised forms @ back

1/26/06 Left message for Donna Weeden. She do not have the correct information on the product specific data matrix. Page 2 of product specific needs to say "cite all" for submitter on the inhalation + dermal sensitization lines. (Internal + Public file copy) and I also need a list to attach to matrix which lists all the companies that own data on this A.I. I asked her to Fax this to me.

1/29/06 Received revised forms - forms appear to be correct

2/8/06 Need to send 75 day letter w/ CSF issues + data matrix issues write note to jacket w/ comments from Dennis + I + Juan of chemistry - work on this 2/13/06

2/13/06 wrote 10 day letter - give to Velma Tuesday - she must respond by 2/28/06.

2/14/06 Faxed + mailed letter to Donna Weeden

2/22/06 renegotiation to Dennis, Velma, Michael

2/27/06 Michael said this renege. was signed by Marty today - Dennis changed due date.

2/27/06 Sent revised chemistry information to review. (rec'd from company 2/27/06)

3/14/06 Juan has required chemistry + will complete review soon.

4/14/06 rec'd acceptable chemistry review from Juan

5/31/06 Generic Matrix should just say "cite all" with attached list. Correct Agency + public file copy.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Office of Pesticide Programs
Antimicrobials Division (7510P)
1200 Pennsylvania Avenue NW
Washington, D.C. 20460

Number:

75174-4

Date of

Issuance:

JUN 1 2006

Term of Issuance:

Conditional

Name of Pesticide Product:

SiS 7200

NOTICE OF PESTICIDE:

☒ Registration
☐ Reregistration

(under FIFRA, as amended)

Name and Address of Registrant (include ZIP Code):

SiShield Technologies Inc.
17 Executive Park Drive, Suite 563
Atlanta, GA 30329

Note: Changes in labeling differing in substance from that accepted in connection with this registration must be submitted to and accepted by the Registration Division prior to use of the label in commerce. In any correspondence on this product always refer to the above EPA registration number.

On the basis of information furnished by the registrant, the above named pesticide is hereby registered/reregistered under the Federal Insecticide, Fungicide and Rodenticide Act.

Registration is in no way to be construed as an endorsement or recommendation of this product by the Agency. In order to protect health and the environment, the Administrator, on his motion, may at any time suspend or cancel the registration of a pesticide in accordance with the Act. The acceptance of any name in connection with the registration of a product under this Act is not to be construed as giving the registrant a right to exclusive use of the name or to its use if it has been covered by others.

This product is conditionally registered in accordance with FIFRA sec 3(c)(7)(a) provided that you:

1. Submit and/or cite all data required for registration of your product under FIFRA sec. 3(c)(5) when the Agency requires all registrants of similar products to submit such data; and submit acceptable responses required for re-registration of your product under FIFRA section 4.
2. Make the labeling changes listed below before you release the product for shipment:
 - a. Revise the EPA Registration Number to read, "EPA Reg. No. 75174-4".

Signature of Approving Official:

Yelma Noble

Product Manager Team-31
Regulatory Management Branch I
Antimicrobials Division (7510P)

Date:

JUN 1 2006

CONCURRENCES

SYMBOL	7510P							
SURNAME	Yelma Noble							
DATE	6/1/06							

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Page 2

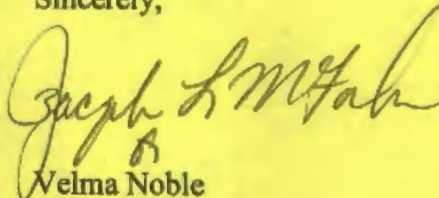
EPA Reg. No. 75174-4

b. Revise the "Approved Uses" section, second column, by deleting "Appliances" and replacing with "*Exterior surfaces of appliances*".

If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA sec. 6(e). Your release for shipment of the product constitutes acceptance of these conditions.

A stamped copy of the label is enclosed for your records. Submit one (1) copy of your final printed labeling prior to release of this product for shipment. If you have any questions concerning this letter, please contact Tracy Lantz at (703) 308-6415.

Sincerely,



Velma Noble
Product Manager 31
Regulatory Branch I
Antimicrobials Division (7510P)

Enclosure: (Stamped Label)
7510P:T. Lantz:6/1/06:75174-4

CONCURRENCES							
SYMBOL							
SURNAME							
DATE							

STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage and disposal.

Pesticide Storage: Store in original closed containers in a secure area inaccessible to children and away from food or feed.

Pesticide Disposal: Pesticide wastes are toxic. Improper disposal of excess pesticide, spray mixture or rinsate is a violation of Federal law. If these wastes cannot be disposed of by use according to the label instructions, contact your State Pesticide or Environmental Control Agency or the Hazardous Waste Representative at the nearest EPA regional office for guidance.

Container Disposal: (plastic) Triple rinse (or equivalent), then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or incineration or, if allowed by state and local authorities, by burning. If burned, stay out of smoke. (metal) Triple rinse (or equivalent), then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or incineration or, other procedures approved by state and local authorities. (glass) Triple rinse (or equivalent), then dispose of in a sanitary landfill or by other approved State and local procedures.

PHYSICAL OR CHEMICAL HAZARDS

Combustible. Do not use or store near heat or open flame. De-activation of SIS 7200 can be achieved by the addition of anionic surfactant (such as soap, sulfonates, sulfates) in quantity equivalent to that of SIS 7200.

ENVIRONMENTAL HAZARDS

This pesticide is toxic to fish. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans, or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the EPA.

NET CONTENTS: 8, 16, 22, 64 oz; 1, 5, 55, or 300 gal



SiShield Technologies Inc.

17 Executive Park Drive, Suite 563, Atlanta GA 30329

404.636.8900 / 404.636.8500 fax -

email: contact.SiShield@msn.net

SIS 7200

A Silicone Quaternary Ammonium Salt
FOR MANUFACTURING USE ONLY

ACTIVE INGREDIENT:

3-(trimethoxysilyl) propyldimethyl octadecyl

ammonium chloride.....72.0%

OTHER INGREDIENTS.....28.0%

TOTAL100%

Contains over 12% methanol

KEEP OUT OF REACH OF CHILDREN

DANGER POISON

Box above will appear in red ink

Lot No. _____

EPA Reg. No. 75174-X

EPA Est. No. 70918-SC-001

FIRST AID

Have the product container or label with you when calling the poison control center or doctor, or going for treatment.

IF IN EYES:

- Hold eye open and rinse slowly and gently with water for 15-20 minutes.
- Remove contact lenses, if present, after the first 5 minutes, then continue rinsing.
- Call poison control center or doctor for treatment advice.

IF INHALED:

- Move person to fresh air.
- If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth, if possible.
- Call a poison control center or doctor for further treatment advice.

IF SWALLOWED:

- Call a poison control center or doctor immediately for treatment advice.
- Have person sip a glass of water if able to swallow.
- Do not induce vomiting unless told to do so by a poison control center or doctor.
- Do not give anything by mouth to an unconscious person.

IF ON SKIN OR CLOTHING:

- Take off contaminated clothing.
- Rinse skin immediately with plenty of water for 15-20 minutes.
- Call a poison control center or doctor for treatment advice.

NOTE TO PHYSICIAN

Probable mucosal damage may contraindicate the use of gastric lavage.

RECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS

DANGER! Corrosive: Methanol may cause blindness. Causes irreversible eye damage. Harmful or fatal if swallowed. Harmful if inhaled. Do not get in eyes or on clothing. Avoid contact with skin. Avoid breathing vapors or mist. Wear protective eyewear (goggles, face shield or safety glasses). Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet. Remove contaminated clothing and wash clothing before reuse.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. FOR MANUFACTURING USE ONLY

ACCEPTED
with COMMENTS

JUN 1 - 2006

Under the Federal Insecticide,
Fungicide, and Rodenticide Act as
amended, for the pesticide,
registered under EPA Reg. No. 75174-4

APPROVED USES

SiS 7200 may be used for incorporation into and treatment of the following substrates to impart bacteriostatic/fungistatic activity:

- Air filters for furnaces, air-conditioners, air purification devices, automobiles, recirculating air handling systems;
- Air filters/materials;
- Aquarium filter material;
- Bed sheets, blankets, and bedspreads;
- Buffer pads (abrasive and polishing);
- Carpets and draperies;
- Concrete additive for sewer pipes, manholes and concrete sewer structures; *(Not to be used in treatment of storm drains)*
- Concrete additive for repair and renewal of sewer pipes and manholes and concrete sewer structures; *(Not to be used in treatment of storm drains)*
- Exterior walls on the outside of architectural structures consisting of stone, concrete or brick
- Fiberfill for upholstery, sleeping bags, apparel; where the fiber is cotton, natural down, nylon, polyester, rayon, or wool;
- Fiberglass ductboard;
- Fire hose fabric;
- Humidifier belts;
- Mattress pads and ticking;
- Men's underwear and outerwear;
- Non-woven disposable diapers;
- Outerwear apparel;
- Polyurethane and cellulose foam for household, industrial, and institutional sponges and mops;
- Polyurethane and polyethylene foam, when covered;
- Polyurethane foam for packaging and cushioning in non-food contact applications;
- Polyurethane foam used as a growth medium for non-food crops and plants;
- Pre-moistened towelettes and tissue wipes (these do not impart pesticidal properties);
- Roofing materials - defined as shingles, roofing granules, wood shakes, felt, stone and synthetic overcoats;
- Sand bags, tents, tarpaulins, sails, and ropes;
- Athletic and casual shoes;
- Shoe insoles;
- Shower curtains;
- Socks comprised of nylon, nylon/orlon, cotton/nylon, linen/Lycra, acrylic/polypropylene/nylon/Lycra, wool/silk/nylon/Lycra and wool/acrylic/nylon/Lycra
- Throw rugs;

- Toweling made of 100 percent cotton, 100 percent polyester, and blends of the two fibers;
- Toilet tank and seat covers;
- Umbrellas;
- Upholstery made of acetates, acrylics, cotton, fiberglass, nylon, polyester, polyethylene, polyolefins, polypropylene, rayon, spandex, vinyl, and wool;
- Vacuum cleaner bags and filters;
- Vinyl paper-wallpaper for non-food contact surfaces;
- Disposable wiping cloths that can be used for multiple purposes such as dusting or washing furniture, cars, walls, windows, floors, exterior surfaces of appliances, dishes, counter tops; the wiping cloths do not impart pesticide properties;
- Women's hosiery; and
- Women's intimate apparel
- For use in formulating products used in residential kitchens and bathrooms on the following hard, non-porous surfaces to impart bacteriostatic/fungistatic activity:
 - Tubs
 - Glazed tile
 - Vanity tops
 - Shower curtains
 - Shower stalls
 - Sinks
 - Washable walls
 - Floors
 - Window sills
 - Cabinets
 - Exterior of refrigerators
 - Appliances
 - Garbage cans
- SiS 7200 can be used in paints and coatings as an in can preservative for the protection of paint film and coating film. Types of paints and coatings include: latex indoor/outdoor paints and stains, woodstains, architectural paints, lacquer and maintenance coatings, film laminates and finishes including alkyd, urethane, enamel, epoxy, siloxaline, amino resins, textile coatings, extrusion coatings, architectural coatings and overlays, anti-corrosion coatings, fire resistant coatings, aliphatic coatings, vinyl ester and polyester coatings, gel coatings, amino resins, resins used as additive mixes for cement, epoxy laminating resins, and blends and copolymers thereof.

SiS 7200

Imparts microbiostatic properties.

Provides an invisible microbiostatic coating to inhibit the growth of odor causing bacteria.

Provides an invisible microbiostatic coating to inhibit the growth of bacteria which cause staining and discoloration.

Provides an invisible microbiostatic coating to inhibit the growth of fungi (mold and mildew).

Provides an invisible microbiostatic coating to inhibit the growth of algae.

Provides an invisible microbiostatic coating to inhibit the growth of odor causing bacteria, bacteria, which cause staining, and discoloration,

fungi (mold and mildew), and algae.

Prevents deterioration caused by bacteria and fungi (mold and mildew).

Inhibits deterioration caused by bacteria.

Resists development of microbial odors.

Resists development of stains and discoloration due to bacteria.

Resists development of stains due to fungi (mold and mildew).

Resists stains due to algae.

Resists development of microbial odors, stains and discoloration due to bacteria, fungi (mold and mildew), and algae.

Provides/creates an invisible barrier to inhibit the growth of odor causing bacteria.

Provides/creates an invisible barrier to inhibit the growth of bacteria, which cause staining, and discoloration.

Provides/creates an invisible barrier to inhibit the growth of fungi (mold and mildew).

Provides/creates an invisible barrier to inhibit the growth of algae.

Provides/creates an invisible barrier to inhibit the growth of odor causing bacteria, bacteria which cause staining and discoloration, fungi (mold and mildew), and algae.

Provides bacteriostatic, fungistatic, (mold and mildew), and algaestatic activity.

Note: Any claims for paint use must be for the preservation of the paint in the can.

IMPORTANT: WARRANTY AND DISCLAIMER INFORMATION

SiShield Technologies, Inc., warrants that the product conforms to its chemical description and is reasonably fit for the purposes stated in this label when used in accordance with directions under normal conditions of use; but this warranty of fitness for a particular purpose does not extend to the use of this product contrary to label instructions, or under abnormal conditions, or under conditions not reasonably foreseeable to seller, and buyer assumes the risk of any such use.

SISHIELD SPECIFICALLY DISCLAIMS ANY OTHER EXPRESS OR IMPLIED WARRANTY, INCLUDING THE WARRANTY OF MERCHANTABILITY.

FOR MORE INFORMATION CONCERNING THIS PRODUCT, PLEASE CONSULT THE MATERIAL SAFETY DATA SHEET (MSDS). THE MSDS CAN BE OBTAINED BY WRITING SISHIELD TECHNOLOGIES, INC. AT 17 EXECUTIVE PARK DRIVE, SUITE 563, ATLANTA, GEORGIA, 30329. EMERGENCY TELEPHONE NUMBER (800-424-9300)

Explore Registrations

Reg Number: 75174-U

Reg. Type: Product Registration - Section 3

Status: Under Review (03-Nov-2005)

Name: SIS 7200

<View Registration Details>

(No New Receipts)

S.	Submission Type	OPP Rec'd Date	Resubmission	Description
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...Decisions...

Data Requirements

Pending, 362263, 75174-U;453,ME-TOO,NEW

Decision Sequence: 362263

Action: A53 ME-TOO,NEW PRODUCT,FAST TRACK

Number: 75174-U Original Decision:

Name: SIS 7200

Decision Status: PENDING (15-Nov-2005)

Organization Owner: AD / RMB1

Team Owner: RM 31

FFS Start Date: 02-Dec-2005 Received by Risk Manager:

Due Date: 02-Mar-2006 FFS Amt Expected: \$1,050

Negotiated Due Date: 02-Jun-2006 FFS Amt Refunded:

FFS Amt Received: \$1,050

Comments:

Fee for Service



This package includes the following

- ☒ New Registration
- ☐ Amendment

- ☒ Studies? ☐ Fee Waiver?
☐ volpay % Reduction: ____

for Division

- ☒ AD
- ☐ BPPD
- ☐ RD

Risk Mgr. 31

Receipt No.

S- 786185

EPA File Symbol/Reg. No.

75174-U

Pin-Punch Date:

11/2/05

☐ This item is NOT subject to FFS action.

Action Code:

Requested:

Granted: A53

Amount Due: \$ 1200 / OSD

Parent/Child Decisions:

Reviewer: Jenkins/Terry

Date: 11-3-05

Remarks:

MEMORANDUM

DATE: 11/8/05

TO: Velma Noble, Regulatory Manager
(31)

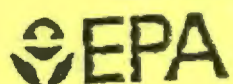
FROM: Information Services Branch, IRSD

Your receipt of this data submission is not an indication that MRIDs for the enclosed studies have been posted in OPPIN.

We expect that it will be approximately 5 days from the above date before the study-level data is available in OPPIN.

If you have any questions about this process, please contact Maureen Sherrill (305-5361) or Teresa Downs (305-5363).

This is a: ☒ fully accepted submission
☐ partially accepted submission
☐ rejected submission



ADMINISTRATIVE NO(S).: 75174-4

PM: 31

CHEMICAL NO.: _____

The jacket for this action can be
requested through the JACKETS system.

FEE FOR SERVICE

PRIA

DATA PACKAGE BEAN SHEET

Date: 28-Feb-2006

Page 1 of 2

Decision #: 362263

DP #: (327271)

*** Registration Information ***

Registration: 75174-U - SIS 7200

Company: 75174 - SISIELD TECHNOLOGIES, INC.

Risk Manager: RM 31 - Velma Noble - (703) 308-6233 Room# CM-2 308B

Risk Manager Reviewer: Tracy Lantz TLANTZ

Sent Date: _____

Calculated Due Date: 02-Jun-2006

Edited Due Date: _____

Type of Registration: Product Registration - Section 3

Action Desc: (A53) ME-TOO;NEW PRODUCT;FAST TRACK;

Ingredients: 107401, 1-Octadecanaminium, N,N-dimethyl-N-(3-(trimethoxysilyl)propyl)-, chloride(72%)

*** Data Package Information ***

Expedite: ☐ Yes ☒ No

Date Sent: 28-Feb-2006

Due Back: _____

DP Ingredient: 107401, 1-Octadecanaminium, N,N-dimethyl-N-(3-(trimethoxysilyl)propyl)-, chloride

DP Title: _____

CSF Included: ☒ Yes ☐ No

Label Included: ☒ Yes ☐ No

Parent DP #: _____

Assigned To

Date In

Date Out

Organization: AD / PSB

2/28/06

Last Possible Science Due Date: 03-May-2006

Team Name: CTT

2/28/06

Science Due Date: 5/2/06

Reviewer Name:

Juan

2/28/06

4/13/06

Sub Data Package Due Date: 4/18/06

Contractor Name:

*** Studies Sent for Review ***

No Studies

*** Additional Data Package for this Decision ***

Printed on Page 2

*** Data Package Instructions ***

Karen - This has been renegotiated with a new due date of 6/2/06/ (previous chemistry review of 2/1/06 identified deficiencies. This is the registrant's reply to my letter 2/14/06. Both replies and letters and review are attached. Original CSF's and label also attached.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Washington, D.C. 20460



OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES
Antimicrobial Division

04/13/06

DP BARCODE: D327271

MRID : N/A

SUBJECT: SIS 7200

REG. NO. OR FILE SYMBOL: 75174-U

DOCUMENT TYPE: Product Chemistry Review

Manufacturing-use ☒ OR End-use Product ☐

INGREDIENTS (PC Codes): 107401 3-(trimethoxysilyl) propyldimethyl octadecyl
ammonium chloride

CAS Number: 27668-52-6

TEST LAB: N/A

SUBMITTER: SiShield Technologies, Inc.

GUIDELINE: 830.6317, 830.6320, & 830.1800

COMMODITIES: Formulation

REVIEWER: Juan F. Negrón

ORGANIZATION: AD

APPROVER: Karen P. Hicks

APPROVED DATE:

4/17/06

COMMENT: See Product Chemistry Review, dated 04/13/06.

TO: Velma Noble / Tracy Lantz
PM Team 31

FROM: Juan F. Negrón, Chemist *JFN*
Product Science Branch, CT Team
Antimicrobial Division (7510C)

THRU:: Karen P. Hicks, CT Team Leader
Product Science Branch
Antimicrobial Division (7510C) *KPH* *4/17/06*

THRU: Michele E. Wingfield, Chief
Product Science Branch
Antimicrobial Division (7510C)

APPLICANT: SiShield Technologies, Inc.

Action code: A53
Due date: 06/02/06

Product Formulation
Active Ingredient(s)

3-(trimethoxysilyl) propyldimethyl octadecyl
ammonium chloride

% by wt.

72.0

BACKGROUND:

The registrant, SiShield Technologies, Inc., is submitting a new registration data package for review. The integrated manufacturing-use product, **SIS 7200**, can be used as a preservative to control growth of odor causing bacteria, mold, mildew, and algae.


FINDINGS:

1. The Product Chemistry Reviewer has received the following documents:
 - Confidential Statements of Formula, dated 10/31/05, 02/15/06, & 03/01/06, for the basic formulation.
 - Letters, dated 02/15/06, & 02/21/06.
 - A label, undated.
 - Application for pesticide, dated 10/31/05. EPA Form 8570-1.
 - Certificate of analysis, dated 05/11/04.
 - Storage Stability and Corrosion Characteristic studies. (Via email, dated 03/10/06).
2. The CSF, dated 10/31/05, & 02/15/06, for the basic formulation is obsolete.
3. The CSF, dated 03/01/06, for the basic formulation is revised.
4. The CSF and the label have the same nominal.
5. The pre-reaction CSF, dated 02/15/06 is acceptable. However, the post-reaction CSF, dated 02/15/06 is obsolete.
6. The product contains an unregistered active ingredient (AI).
7. All inerts have clearance for inert use.
8. The registrant submitted a certificate of analysis for the raw material active ingredient (AI). The results are based on amine since the method that the laboratory used was designed for amine.
9. The registrant did not include an alternate solvent, [REDACTED], due to the toxicity profile. This means that the registrant cannot use the [REDACTED] in this product.
10. The 830.6317 Corrosion Characteristics study conducted from 05/13/04 to 03/09/06 shows no evidence of deterioration or any signs of corrosion to a five-gallon pails and 55-gallon drums. The product is packaged and marketed in 5-gallon pails and a 55-gallon drum that consists of a heavy-duty type-high density plastic 40BH with tubular rubber gaskets (type 40CR or 40CT). For more information, see study mentioned above.
11. The storage stability shows that the certified limits for the AI meets the EPA standard certified limits.
12. The registrant indicates that the preliminary analysis study in volume 3 of 75174-U submission can be used as the 830.1800 Enforcement Analytical Method. See statement, dated 03/08/06 email.

CONCLUSION:

The pre-reaction CSF, dated 02/15/06, for the basic formulation is acceptable. The post-reaction CSF, dated 03/01/06, for the basic formulation is acceptable. The certificate of analysis is acceptable. The Storage Stability and Corrosion Characteristic studies are acceptable.

Send to: Ms. Tracy Lantz EPA OPP /Antimicrobial Division	From: Donna Weeden Regulatory Agent
Attention: Ms. Tracy Lantz	Date: 15 February 2006
Office Location: EPA OPP /Antimicrobial Division	Office Location:
Fax Number: 703-308-8481	Phone Number: 770-513-3906 for Donna Weeden

 Urgent

- ☐ Reply ASAP
- ☐ Please comment
- ☐ Please review
- ☐ For your information

Total pages, including cover: 5

RE: SiShield Technologies, Inc. 75174-U, response to EPA letter dated and received via fax on 14 Feb 2006.

Comments:

Dear Tracy,

This is a formal response to the EPA deficiency letter dated 14 Feb 2006 regarding 75174-U (SiS7200). According to the deficiency letter the following has been addressed:

1. The addition of pre reaction formulation and post reaction formulation has been added to the CSFs. See attached CSFs noting pre and post reactions.
2. The incorrect calculations for the upper and lower limits noted on the post reaction CSF (page 2) have been revised per EPA letter. See attached CSF noting corrected values.
3. [REDACTED] have been revised to be declared as unreacted chemicals instead of impurities in the formulation. Please see attached post reaction formulation CSF noting the changes.
4. Formulation made with alternate solvent ([REDACTED]) has been submitted as a separate product registration with a separate CSF.

Inert ingredient information may be entitled to confidential treatment

Manufacturing process information may be entitled to confidential treatment

5. The purity of the AI on the post reaction CSF has been noted as 72% shown in column 10 of the CSF.

6. A certificate of analysis for the final product SiS 7200 has been included with this fax.

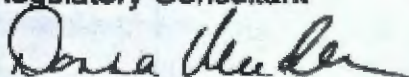
7. No action required.

8. The phone number noted is the correct phone number. There were some telephone problems during the time of contact. We have noted an additional contact number as a backup. This number has been included on the revised CSFs.

I trust you find this response acceptable and contact me if you are still in need of additional information. I can be reached at (770-513-3906) or via email weedenat2004@yahoo.com. Once again, I appreciate your assistance in addressing this deficiency.

Warm regards,

Donna Weeden
Regulatory Consultant





EPH

2406

SiShield Technologies Inc.

17 Executive Park Drive, Suite 563, Atlanta GA 30329
404.636.8900 / 404.636.8500 fax – email: contact_SiShield@msn.net

Antimicrobials Division (7510W)
Atn: Tracy Lantz
U.S. Environmental Protection Agency
Document Processing Desk (APPL)
Room 226A, Crystal Mall 2
1801 South Bell Street
Arlington, VA 22202-4501

21 Feb 2006

Via Federal Express

**RE: Revised hard copies of CSF and Certificate of analysis for 75174-U, SiS 7200;
Decision no. 362263; Submission no. 786185 already in review.**

Dear Document Processing Desk:

On behalf of SiShield Technologies, Inc. and per the request of Ms. Tracy Lantz of AD the enclosed documents are in support of the review of 75174-U. The enclosed revised documents have already been submitted in support of the application for registration that is currently under review. Hard copies are being submitted due to non clarity via fax.

Sincerely,

Donna Weeden
Regulatory Agent



Just Me
<weedenatl2004@yahoo.com>

03/10/2006 12:00 PM

To Juan Negron/DC/USEPA/US@EPA

cc

bcc

Subject Fwd: Re: Product Chemistry Review - Additional requested
item to satisfy 830.6317 Storage Stability guideline
(75174-U) SiS 7200

Hi Juan,
Please note that the subject of my previous email below had the incorrect guideline number noted for corrosion. I am sure you are aware of the correct guideline number for corrosion, which is 830.6320.

Attached to this email is additional requested information to satisfy 830.6317 Storage Stability. This information was summarized. Please let me know what else is required, if anything.
Warm regards,
Donna

--- Just Me <weedenatl2004@yahoo.com> wrote:

> Date: Fri, 10 Mar 2006 06:36:41 -0800 (PST)
> From: Just Me <weedenatl2004@yahoo.com>
> Subject: Fwd: Re: Product Chemistry Review -
> Additional requested item to satisfy guideline
> 830.6317 Corrosion Characteristics (75174-U) SiS
> 7200
> To: Negron.Juan@epamail.epa.gov
>

> Hello Juan,
> I have attached a signed document from SiShield to
> satisfy the additional requested information for
> guideline 830.6317 Corrosion Characteristics. If
> additional information is required, please contact
> me
> immediately. 404-271-7925 I will send a separate
> email with the storage stability information.
> Regards,
> Donna Weeden
>

> --- Just Me <weedenatl2004@yahoo.com> wrote:

> > Date: Wed, 8 Mar 2006 08:48:23 -0800 (PST)
> > From: Just Me <weedenatl2004@yahoo.com>
> > Subject: Re: Product Chemistry Review - Additional
> > requested item to satisfy guideline 830.1800
> > (75174-U) SiS 7200
> > To: Negron.Juan@epamail.epa.gov
> >

> > Hello Juan,
> > Please see the statement below to satisfy
> > guideline
> > 830.1800 (Enforcement Method) for the chemistry of
> > 75174-U (SiS 7200).
> >
> > I, Donna Weeden, Regulatory Agent for SiShield
> > Technologies, is stating that the analytical
> > methods
> > (non aqueous titration and HPLC) noted in volume 3
> > of
> > 75174-U Submission entitled SiS 7200-Preliminary
> > Analysis of Chemical Composition" which is the
> > preliminary analysis study, can be used as the
> > analytical enforcement methods for the product SiS
> > 7200.
> > Please let me know if additional information is

> > required. Additional requested chemistry
> > information
> > to satisfy guidelines 830.6317 Storage Stability
> > and
> > 830.6317 Corrosion Characteristics is forthcoming.
> > As
> > always I appreciate your assistance in addressing
> > this
> > matter.
> > Warm regards,
> > Donna Weeden
> >
> >
> >
> > --- Negron.Juan@epamail.epa.gov wrote:
> >
> > > Good afternoon! I summarized the Product
> > Chemistry
> > > requirements, and
> > > found three items that needs to be address. I
> > > need
> > > the 830.1800
> > > enforcement analytical method guideline. You can
> > > use
> > > the preliminary
> > > analysis as enforcement analytical method.
> > However,
> > > I need a statement
> > > from you indicating what the enforcement
> > > analytical
> > > method to be use is.
> > > Please submit a copy of the enforcement
> > > analytical
> > > method.
> > > I also need the 830.6317 Storage Stability
> > > guideline. This
> > > guideline is intended to assay the product
> > > during
> > > (0, 3, 6, 9, 12)
> > > months. You also need to apply the 830.6320
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> > > guideline along with the 830.6317 guideline. The
> > > purpose of this
> > > guideline is to check the package in which is
> > > going
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> > > during one year. For example, if the seal has
> > > been
> > > compromise or any
> > > deterioration on the package itself.
> > > For any concern, please let me know. I
> > > will
> > > be
> > > more than glad to
> > > help you. Please call me, to know how to sent
> > > the
> > > package. You have a
> > > nice day.
> > >
> > > U.S. Environmental Protection Agency
> > > Antimicrobial Division

> > > Juan F. Negrón, Chemist
> > > Phone # 703-308-8116
> > > Fax # 703-308-8481
> > > Room 308 W16
> > > Mail Code: 7510C
> > > 1801 S. Bell Street
> > > Arlington, VA 22202
> > >
> > >

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030806StorageStability[1].doc



Just Me
<weedenat12004@yahoo.com>

03/10/2006 09:36 AM

To Juan Negron/DC/USEPA/US@EPA

cc

bcc

Subject Fwd: Re: Product Chemistry Review - Additional requested
item to satisfy guideline 830.6317 Corrosion Characteristics
(75174-U) SiS 7200

Hello Juan,

I have attached a signed document from SiShield to satisfy the additional requested information for guideline 830.6317 Corrosion Characteristics. If additional information is required, please contact me immediately. 404-271-7925 I will send a separate email with the storage stability information.

Regards,

Donna Weeden

--- Just Me <weedenatl2004@yahoo.com> wrote:

> Date: Wed, 8 Mar 2006 08:48:23 -0800 (PST)
> From: Just Me <weedenatl2004@yahoo.com>
> Subject: Re: Product Chemistry Review - Additional
> requested item to satisfy guideline 830.1800
> {75174-U} SiS 7200
> To: Negron.Juan@epamail.epa.gov
>
> Hello Juan,
> Please see the statement below to satisfy guideline
> 830.1800 (Enforcement Method) for the chemistry of
> 75174-U (SiS 7200).
>
> I, Donna Weeden, Regulatory Agent for SiShield
> Technologies, is stating that the analytical methods
> (non aqueous titration and HPLC) noted in volume 3
> of
> 75174-U Submission entitled SiS 7200-Preliminary
> Analysis of Chemical Composition" which is the
> preliminary analysis study, can be used as the
> analytical enforcement methods for the product SiS
> 7200.
> Please let me know if additional information is
> required. Additional requested chemistry
> information
> to satisfy guidelines 830.6317 Storage Stability and
> 830.6317 Corrosion Characteristics is forthcoming.
> As
> always I appreciate your assistance in addressing
> this
> matter.
> Warm regards,
> Donna Weeden
>
>
>

> --- Negron.Juan@epamail.epa.gov wrote:

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> > Good afternoon! I summarized the Product Chemistry
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> However,
> > I need a statement
> > from you indicating what the enforcement

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iaclet.pdf



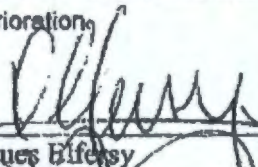
SiShield Technologies, Inc.

17 Executive Park Drive, Suite 563, Atlanta, GA 30329

404.636.8900 / 404.636.8500 fax - Email: contact_SiShield@msn.com

The following statement is to satisfy additional requested information relating to guideline 830.8317 Corrosion Characteristics in support of the registration of 75174-U (SiS 7200). SiS 7200 is packaged and marketed in 5 gallon pails and 55 gallon drums. The pail consists of a heavy duty type high density plastic 40BH with tubular rubber gaskets (type 40CR or 40CT). The 5 gallon pail comes with a metal handle with plastic grip. The pail is approved for UN Group II & III hazardous materials. The 55 gallon drum is a closed top steel drum with a rust inhibitor lining. This drum meets UN requirements for hazardous materials.

SiS 7200 (EPA registration number 75174-U) Lot number D047433 dated 5/13/04 was packaged in both the 5 gallon pails and 55 gallon drums as described above. As of this date 09 March 2006, the packaging of SiS 7200 Lot number D047433 dated 5/13/04 remains in tact with no evidence of deterioration. Neither packaging (pail or drum) show any signs of corrosion or deterioration.



Jacques Bifery
CEO SiShield Technologies, Inc

Date 3/9/06



Just Me
<weedenatl2004@yahoo.com>

03/08/2006 11:48 AM

To Juan Negron/DC/USEPA/US@EPA

cc

bcc

Subject Re: Product Chemistry Review - Additional requested item to
satisfy guideline 830.1800 (75174-U) SIS 7200

Hello Juan,
Please see the statement below to satisfy guideline
830.1800 (Enforcement Method) for the chemistry of
75174-U (SiS 7200).

I, Donna Weeden, Regulatory Agent for SiShield
Technologies, is stating that the analytical methods
(non aqueous titration and HPLC) noted in volume 3 of
75174-U Submission entitled SiS 7200-Preliminary
Analysis of Chemical Composition" which is the
preliminary analysis study, can be used as the
analytical enforcement methods for the product SiS
7200.

Please let me know if additional information is
required. Additional requested chemistry information
to satisfy guidelines 830.6317 Storage Stability and
830.6317 Corrosion Characteristics is forthcoming. As
always I appreciate your assistance in addressing this
matter.

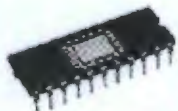
Warm regards,
Donna Weeden

--- Negron.Juan@epamail.epa.gov wrote:

> Good afternoon! I summarized the Product Chemistry
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> Please submit a copy of the enforcement analytical
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> months. You also need to apply the 830.6320
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> during one year. For example, if the seal has been
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> deterioration on the package itself.
> For any concern, please let me know. I will be
> more than glad to
> help you. Please call me, to know how to sent the
> package. You have a
> nice day.
>
> U.S. Environmental Protection Agency
> Antimicrobial Division
> Juan F. Negrón, Chemist
> Phone # 703-308-8116

> Fax # 703-308-8481
> Room 308 W16
> Mail Code: 7510C
> 1801 S. Bell Street
> Arlington, VA 22202
>
>

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Juan Negrón/DC/USEPA/US

03/02/2006 02:47 PM

To Just Me <weedenatl2004@yahoo.com>

cc weedenatl2004@yahoo.com, Tracy
Lantz/DC/USEPA/US@EPA

bcc

Subject Re: Product Chemistry Review.

75174-U



Good afternoon! I summarized the Product Chemistry requirements, and found three items that need to be addressed. I need the 830.1800 enforcement analytical method guideline. You can use the preliminary analysis as enforcement analytical method. However, I need a statement from you indicating what the enforcement analytical method to be used is. Please submit a copy of the enforcement analytical method.

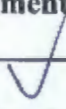
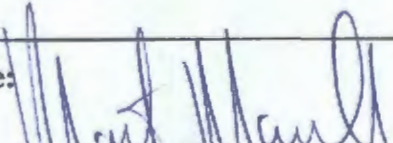
I also need the 830.6317 Storage Stability guideline. This guideline is intended to assay the product during (0, 3, 6, 9, 12) months. You also need to apply the 830.6320 Corrosion Characteristics guideline along with the 830.6317 guideline. The purpose of this guideline is to check the package in which is going to be marketed during one year. For example, if the seal has been compromised or any deterioration on the package itself.

For any concern, please let me know. I will be more than glad to help you. Please call me, to know how to send the package. You have a nice day.

U.S. Environmental Protection Agency
Antimicrobial Division
Juan F. Negrón, Chemist
Phone # 703-308-8116
Fax # 703-308-8481
Room 308 W16
Mail Code: 7510C
1801 S. Bell Street
Arlington, VA 22202

*I spoke to Juan on
3/14/06*

*he has the information
and will work
to finish the
review.*

Recommendation of Division Directors Negotiated Due Dates		
Decision#: 362263		Registration#: 75174-U
Fee Category: A53		PRIA Decision Time Frame: 90 days
Submitted by: Tracy Lantz/Velma Noble	Branch: RMBI	Date: 2/22/06
Company: SiShield Technologies, Inc.		
Original Due Date: 3/2/06		Proposed New Due Date: 6/2/06
Previous Negotiated Due Dates: None		
Issue (describe in detail): Product Chemistry review identified deficiencies including errors on the Confidential Statement of Formula and the requirement of a certificate of analysis on the final product.		
Describe Interactions with Company (describe when contacted and company's response including response to previous negotiated due dates): The company was originally contacted on 2/14/06. The company sent corrections on 2/15/06 and submitted a proposed renegotiation date on 2/22/06. In order to allow for a 90 day review period after submission of the chemistry data, the company has agreed to a renegotiated due date of June 2, 2006.		
Rationale for Proposed Due Date: The proposal for an additional 90 days is appropriate so that the data can be reviewed again by the Agency chemists.		
Other Comments:		
Approved: 		Disapproved:
If disapproved, action to be taken:		
OD or DOD Signature:  DOD 2-28-06		

Send to: Ms. Tracy Lantz EPA OPP /Antimicrobial Division	From: Donna Weeden Regulatory Agent
Attention: Ms. Tracy Lantz	Date: 21 February 2006
Office Location: EPA OPP /Antimicrobial Division	Office Location:
Fax Number: 703-308-8481	Phone Number: 770-513-3906 for Donna Weeden

Total pages, including cover: /

RE: SiShield Technologies, Inc. 75174-U (SiS 7200), renegotiated review dates.

Comments:


Dear Tracy,

This fax is to inform you that SiShield is aware of and in agreement with the revised noted PRIA review date of 02 June 2006 for 75174-U noted in your 14 Feb 2006 deficiency letter.

Also as requested, I have submitted via mail hard copies of the corrected CSF's and certificate of analysis for your review which you should receive in the next couple of days. If you have not received the hard copies by 24th of Feb 2006, please contact me immediately.

I trust you find this response acceptable and contact me if you are still in need of additional information. I can be reached at (770-513-3906) or via email weedenat12004@yahoo.com. Once again, I appreciate your assistance it addressing this deficiency.

Warm regards,


Donna Weeden
Regulatory Consultant

Send to: Ms. Tracy Lantz EPA OPP /Antimicrobial Division	From: Donna Weeden Regulatory Agent
Attention: Ms. Tracy Lantz	Date: 16 February 2006
Office Location: EPA OPP /Antimicrobial Division	Office Location:
Fax Number: 703-308-8481	Phone Number: 770-513-3906 for Donna Weeden

Total pages, including cover:

RE: SiShield Technologies, Inc. 75174-U and 75174-L, renegotiated review dates.

Comments:

Dear Tracy,

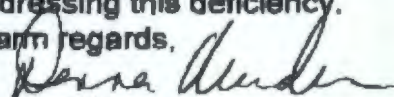
Thank you for informing me of the receipt of the fax I sent to you yesterday in response to 75174-U (SiS 7200). As noted in your email I did not note the renegotiated time frame however you noted a new time frame of 02 June 2006. I would like to request a sooner review on this since this entire application was being resubmitted for review due to non payment of fees so the exact same information was previously submitted to the agency. Unfortunately the history of the prior deficiencies of the submission which has caused a repeat of corrections to be made. Based on the fact that the submission has already been through a review and been approved I would like to request a PRIA of 02 April 2006.

Regarding the PRIA for 75174-L (SiS 7200 WB) I agree with your suggested due date of 14 Nov 2006.

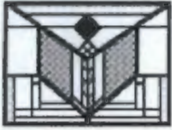
Also, if I have submissions in review and I am aware of an error on the CSF how do I go about changing it now to avoid this type of delay? Please advise.

I trust you find this response acceptable and contact me if you are still in need of additional information. I can be reached at (770-513-3906) or via email weedenat12004@yahoo.com. Once again, I appreciate your assistance it addressing this deficiency.

Warm regards,


Donna Weeden
Regulatory Consultant

2/16/06
asked for
a revised
renego.
+
separate
letters.
Akoma
CSF info



Tracy Lantz/DC/USEPA/US
02/15/2006 05:39 PM

To Just Me <weedenatl2004@yahoo.com>
cc
bcc
Subject Re: Fw: 75174-L

I did receive your FAX for 75174-U.

Please look at the option #1 in this letter. It states that you may resolve the issues in ten business days and at the same time you are to "Please include your proposed re-negotiated PRIA due date." The fax I received today does not include a proposed new due date. We must allow time for this information to be sent back into review. This is a 90 day review time frame, and since this information will need to be returned to the chemist for review, this amount of time will likely be required to re-review your information. **It is suggested that you propose a new due date of 6/2/06.**

Please do let me know when you FAX the proposed renegotiation due date for 75174-L.

Thanks for your reply.

Just Me <weedenatl2004@yahoo.com>



Just Me
<weedenatl2004@yahoo.com>
02/15/2006 05:11 PM

To Tracy Lantz/DC/USEPA/US@EPA
cc
Subject Re: Fw: 75174-L

> studies to be completed.
> Since this is the case, and to allow for the
> information to be sent to
> you and then forwarded to us, and considering that
> the Agency review
> time for this submission is 4 months, I suggest that
> you send us a
> letter stating that you agree to a renegotiated due
> date of 11/14/06.
> This should allow time for the studies to be
> completed, forwarded, and
> reviewed by the Agency.
>
> Please FAX this renegotiation letter to us in the
> next two days. This
> letter should be signed by you, on your letterhead,
> reference the file
> symbol for this product and indicate the studies
> which you plan to run
> to fulfill the data requirements for this product.
> Then indicate that
> you are agreeing to a renegotiated due date and
> state the date.
>
> Thanks.
>
>

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Send to: Ms. Tracy Lantz EPA OPP /Antimicrobial Division	From: Donna Weeden Regulatory Agent
Attention: Ms. Tracy Lantz	Date: 15 February 2006
Office Location: EPA OPP /Antimicrobial Division	Office Location:
Fax Number: 703-308-8481	Phone Number: 770-513-3906 for Donna Weeden

- ☒ **Urgent**
- ☐ **Reply ASAP**
- ☐ **Please comment**
- ☐ **Please review**
- ☐ **For your information**

Total pages, including cover: **5**

RE: SiShield Technologies, Inc. 75174-U, response to EPA letter dated and received via fax on 14 Feb 2006.

Comments:

Dear Tracy,

This is a formal response to the EPA deficiency letter dated 14 Feb 2006 regarding 75174-U (SIS7200). According to the deficiency letter the following has been addressed:

1. The addition of pre reaction formulation and post reaction formulation has been added to the CSFs. See attached CSFs noting pre and post reactions.
2. The incorrect calculations for the upper and lower limits noted on the post reaction CSF (page 2) have been revised per EPA letter. See attached CSF noting corrected values.
3. [REDACTED] have been revised to be declared as unreacted chemicals instead of impurities in the formulation. Please see attached post reaction formulation CSF noting the changes.
4. Formulation made with alternate solvent [REDACTED] has been submitted as a separate product registration with a separate CSF.

Inert ingredient information may be entitled to confidential treatment

Manufacturing process information may be entitled to confidential treatment

5. The purity of the AI on the post reaction CSF has been noted as 72% shown in column 10 of the CSF.

6. A certificate of analysis for the final product SiS 7200 has been included with this fax.

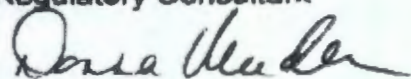
7. No action required.

8. The phone number noted is the correct phone number. There were some telephone problems during the time of contact. We have noted an additional contact number as a backup. This number has been included on the revised CSFs.

I trust you find this response acceptable and contact me if you are still in need of additional information. I can be reached at (770-513-3906) or via email weedenat2004@yahoo.com. Once again, I appreciate your assistance it addressing this deficiency.

Warm regards,

Donna Weeden
Regulatory Consultant



*** TX REPORT ***

TRANSMISSION OK

TX/RX NO	3736	
CONNECTION TEL		917705133906
SUBADDRESS		
CONNECTION ID		
ST. TIME	02/14 18:57	
USAGE T	03'10	
PGS.	4	
RESULT	OK	

United States Environmental Protection Agency

Washington, D.C. 20460



Office of Prevention, Pesticides and Toxic Substances

Office of Pesticide Programs

Antimicrobial Division

FAX NUMBER (703) 308-8481

FACSIMILE REQUEST/COVER SHEET

(Please type or print clearly in black ink only)

SEND FAX TO:

Name: Donna Weeden

Office: _____

FAX phone No. 770 513 3906Office Phone: 770 513 3906

From:

Name: Tracy LantzDivision/Branch: ADOffice Phone No: 703 308 6415Mail Code: 7510C Date: 2/14/06 Time: 5:55PMNumber of pages (with this cover sheet): 4

Special Message: _____

Please return to this Div ASAP!

United States Environmental Protection Agency

Washington, D.C. 20460



Office of Prevention, Pesticides and Toxic Substances

Office of Pesticide Programs

Antimicrobial Division

FAX NUMBER (703) 308-8481

FACSIMILE REQUEST/COVER SHEET

(Please type or print clearly in black ink only)

SEND FAX TO:

Name: Donna Weeden

Office: _____

FAX phone No. 770 513 3906

Office Phone. 770 513 3906

From:

Name: Tracy Lantz

Division/Branch: AD

Office Phone No: 703 308 6415

Mail Code: 7510C Date: 2/14/06 Time: 5:55PM

Number of pages (with this cover sheet): 4

Special Message:

Please respond to this Fax ASAP!
This letter was faxed with your permission.

Thanks!

Donna Weeden
Consultant for SiShield Technologies, Inc.
310 Twin Brook Way
Lawrenceville, GA 30043

FEB 14 2006

RE: Application for Registration dated October 31, 2005
Product Name: SiS 7200
EPA File Symbol: 75174-U

Dear Ms. Donna Weeden:

Our records indicate that the decision review period for EPA to make a determination regarding the above referenced application ends on March 2, 2006 as pursuant to the Pesticide Registration Improvement Act (PRIA). The Agency has reviewed your application and determined the action to be deficient for the following reasons:

1. Revise the Confidential Statements of Formula (CSFs) to indicate the pre-reaction formulation and the post-reaction formulation.
2. Revise the CSFs to indicate the correct percent by weight and upper and lower certified limits as follows:

Active Ingredient	% by weight from 73.2 to 72.0	upper limit from 75.4 to 74.2	lower limit from 71.0 to 69.8
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

3. [REDACTED] should not be declared as impurities in the post reaction CSF. These components should be declared as "unreacted chemical" or by their specific purpose in the formulation if it is known.

CONCURRENCES							
SYMBOL	7510C	7510L					
SURNAME	J. J. [REDACTED]	V. [REDACTED]					
DATE	2/14/06	2/14/06					

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

4. The formula with the alternate solvent [REDACTED] must be a separate registration as per the Agency letter for 75174-1 dated 10/22/03. Such a change in the formulation would result in a change in the toxicity statements associated with this product. Information regarding this alternate formulation should not be included in the chemistry data submitted for this product.
5. Indicate the purity of the AI in column 10 of the post-reaction CSF.
6. Submit a certification of analysis of the final product.
7. It is not required that the studies represented in MRIDs 466829-01 and -03 meet GLP guidelines. These studies do not need to be revised in reference to GLP guidelines.
8. Revise box 20 of the CSF to indicate the phone number of the appropriate point of contact regarding this formula.

These deficiencies must be corrected before the Agency can proceed further with this application.

You have the following three options:

1. **Resolve the issue(s) within 10 business days.** You may resolve the issue(s) identified in this letter by submitting via facsimile or email the information requested within 10 business days from the date of this letter or an explanation of why it will take longer to correct the deficiencies. Please include your proposed re-negotiated PRIA due date at this time. If no other issues arise as a result of your response(s) to this letter, it is the Agency's expectation that resolution of the deficiencies will result in the granting of your application.
2. **Withdraw your application.** You may voluntarily withdraw your application and receive up to 90% of any monies paid under PRIA if this action is taken before the 60th day after your PRIA start date. If you voluntarily withdraw your application after day 60, the Agency will determine the appropriate refund based upon the policy on the Agency web site. You may view this at http://www.epa.gov/pesticides/fees/fee_reductions.htm. Once you re-submit your application, it will be subject to a new PRIA fee schedule.

CONCURRENCES							
SYMBOL							
SURNAME							
DATE							

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

3. **Do nothing.** If you do not respond to this letter within 10 business days, or if you do not wish to re-negotiate the PRIA deadline, the Agency may issue a determination not to grant your application. A determination not to grant your application may require a new PRIA application and fee. Because this determination is not a denial under section 3 (c) (6) of FIFRA, you may request that EPA issue a formal denial under procedures outlined in section 3 (c) (6) of FIFRA and 40 CFR§ 152.118. The process includes publication of a notice of denial in the Federal Register and a possible public hearing.

If you have questions concerning this letter, please contact Velma Noble, Team Leader 31, by telephone at (703) 308-6233 or by e-mail at noble.velma@epa.gov.

Sincerely,

DHE

Dennis Edwards, Branch Chief, RMBI
Antimicrobials Division
Office of Pesticide Programs

7510C:T.Lantz:2/13/06:75174-U 10 day letter

CONCURRENCES							
SYMBOL							
SURNAME							
DATE							

NOTE TO THE JACKET

75174-U

2/8/06

I received a chemistry review (D324179) on this product dated 2/1/06. Dennis and I discussed the deficiencies identified in the recommendations section of this review and the following conclusions were noted:

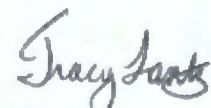
#3. After discussion with Juan we will revise this comment to read:

[REDACTED] should not be declared as impurities in the post reaction CSF. These components should be declared as unreached chemical or by their specific purpose in the formulation if it is known."

#4. Juan's comment #4 is inaccurate. The alternate solvent can not be used in an alternate formula for this product as this formula would not be in agreement with the poison/skull & crossbones language on the label. This comment should state:

"The formula with the alternate solvent [REDACTED] must be a separate registration as per the Agency letter for 75174-1 dated 10/22/03. Such a change in the formulation would result in a change in the toxicity statements associated with this product. Information regarding this alternate formulation should not be included in the chemistry data submitted for this product."

#7. Juan's comment #7 is inaccurate. I will provide the following comment: *"It is not required that the studies represented in MRIDs 466829-01 and -03 meet GLP guidelines. These studies do not need to be revised in reference to GLP guidelines."*



Tracy Lantz
Team 31

75174-Un

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Washington, D.C. 20460



OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES
Antimicrobial Division

01/27/06

SUBJECT: PRODUCT CHEMISTRY REVIEW OF: SiShield Technologies Inc.
DP Barcode: D324179
Reg. No. or File Symbol 75174-U

TGAI/Manufacturing-use Product [X] OR End-use Product []

TO: Velma Noble / Tracy Lantz
PM Team 31

FROM: Juan F. Negrón, Chemist
Product Science Branch, CT Team
Antimicrobial Division (7510C)

THRU:: Karen P. Hicks, CT Team Leader
Product Science Branch
Antimicrobial Division (7510C)

THRU: Michele E. Wingfield, Chief
Product Science Branch
Antimicrobial Division (7510C)

APPLICANT: SiShield Technologies, Inc.

Action code: A53
Due date: 02/21/06

Product Formulation
Active Ingredient(s)

3-(trimethoxysilyl) propyldimethyl octadecyl
ammonium chloride

% by wt.

72.0

BACKGROUND:

The registrant, SiShield Technologies, Inc., is submitting a new registration data package for review. The integrated manufacturing-use product, **SiShield Technologies Inc.**, can be used as a preservative to control growth of odor causing bacteria, mold, mildew, and algae.

FINDINGS:

1. The Product Chemistry Reviewer has received the following documents:
 - Confidential Statement of Formula, dated 10/31/05, for the basic formulation.
 - A letter, dated 10/31/05 MRID # 466829-00.
 - A label, undated.
 - Application for pesticide, dated 10/31/05. EPA Form 8570-1.
 - Self-certification statement for the physical/chemical properties (PR NOTICE 98-1), dated 10/31/05. EPA Form 8570-37.
 - Summary of the physical/chemical properties (PR Notice 98-1), dated 10/31/05. EPA Form 8570-36.
 - MSDS for SiShield SiS 7200, dated 10/07/05.
 - A Me-too label, BSTI 1860, dated 05/30/02.
 - A study title "SiS 7200: Product Identity and Disclosure of Ingredients Description of the Beginning Materials and Manufacturing Process, and Discussion of the formation of Impurities." Volume 2 of 4. MRID #466829-01.
 - A study title "Preliminary Analysis of Chemical Composition." MRID # 466829-02.
 - A study title "SiS 7200 Certified Limits." MRID # 466829-03.
2. The CSF, dated 10/31/05, for the basic formulation is revised.
3. The CSF and the label do not have the same nominal.
4. The CSF has a pre-reaction and a post-reaction. However, neither CSFs are identified as such.
- 5. The product contains an unregistered active ingredient (AI).
6. All inerts have clearance for inert use.
7. The percentage by weight and the certified limits need to be revised for all components. The certified limits do not harmonize with the EPA standard certified limits.
8. The CSF shows two inerts that are intentionally added as impurities. The impurities show values for the lower certified limit. One impurity shows a percentage by weight of [REDACTED] and the second impurity shows a percentage by weight of [REDACTED]

9. The registrant is using an alternate solvent, [REDACTED]. However, the solvent is not reflected in the CSF formulation. The solvent is cleared for inert use. See page 11 of 43 from MRID #466829-01.
10. The registrant does not indicate that the AI yields 100% after the chemical reaction. See page 12 of 43 from the MRID #466829-01. Furthermore, on page 7 of 20 from the MRID #466829-02, it is indicated that the AI concentration is found to be in a range of 71 – 73.6% from six lots. The assay does not indicate if it has been done for the pre-reaction or for the post-reaction.
11. The registrant indicates in the preliminary analysis that when using methanol as a solvent the AI yields 73.2% average. However, when using [REDACTED] as a solvent the AI yields 71.9% average. See MRID #466829-02, page 10 of 20.
12. The registrant has indicated (in MRID # 466829-01 & 03) that the information was not required under the GLP guidelines.
13. The phone number on the CSF is a voice mail for the registrant employees.

RECOMMENDATION:

1. The registrant should indicate on the CSFs the pre-reaction and the post-reaction.
2. The registrant should change the percentage by weight and the certified limits as follows:

Components	Percentage by weight		Upper limit %		Lower limit %	
	from	to	from	to	from	to
AI	73.2	72.0	75.4	74.2	71.0	69.8

3. [REDACTED] should not be declared as impurities. These components are over 0.1% by weight in the formula.
4. The registrant should include the alternate solvent, [REDACTED] in the CSF formulation.
5. The registrant should indicate the purity of the AI in column 10 of the post-reaction CSF.
6. The registrant needs to submit a certificate of analysis of the final product.

7. The registrant needs to update the statement in MRID # 466829-01 & 03 documents, since the information provided indicated that both documents meets the GLP guideline. Furthermore, all 830 guidelines should be conducted under GLP.
8. The registrant should indicate in box 20 of the CSF the phone number that can be reached.

CONCLUSION:

The CSF, dated 10/31/05, for the basic formulation is not acceptable. The registrant must comply with the requirements, recommendations and findings listed above. Please see Product Chemistry Reviewer Table below for deficiencies found in the documents.

PRODUCT CHEMISTRY REVIEW

11. CONFIDENTIAL STATEMENT OF FORMULA

11a. Type of formulation and source registration

- Non-integrated formulation system ☐
- Are all TGAI used registered? Yes ☐ No ☐ NA ☒
- Integrated formulation system ☒
- if "ME-TOO," specify EPA Reg. # of existing product: 70871-12 transfer to 75497-6.

11b. Clearance of inerts for non-food or food use:

Cleared for food use under 40 CFR §180.1001: Yes ☒ No ☐ NA ☐

11c. Physical state of the product: semi solid.

11d. The chemical IDs and analytical information (including that for the TGAI), density, pH, and flammability are consistent with that given in 830.1000, Series A and 830.7300, .7000 and .6315 respectively: Yes ☐ No ☒

11h. NCs and CLs are: acceptable ☐ Not acceptable ☒

11i. Active ingredient (s)

NC UCL LCL

A. 3-(trimethoxysilyl) propyldimethyl octadecyl ammonium chloride

73.2 75.4 71.0

These values do not harmonize with the following: the label, & the EPA standard certified limits.

11j. For products produced by an integrated formulation system:

- All impurities of toxicological significance have a UCL?
Yes ☐ No ☐ Not applicable ☒
- All impurities of $\geq 0.1\%$ in the product have been identified?
Yes ☐ No ☐ Not applicable ☒

12. PRODUCT LABEL

12a. The active ingredients statement (chemical IDs and NC) is consistent with the CONFIDENTIAL STATEMENT OF FORMULA? Yes ☐ No ☒

12b. The formulation contains one of the following:

- 10% or more of a petroleum distillate: Yes ☐ No ☒
- 1.0% or more of methyl alcohol: Yes ☐ No ☒
- Sodium nitrite at any level: Yes ☐ No ☒
- a toxic List 1 inert at any level: Yes ☐ No ☒
- arsenic in any form: Yes ☐ No ☒

12c. If Yes to any of the above, does the inert ingredients statement contain a footnote indicating this? Yes ☐ No ☐ Not applicable ☒

12d. The appropriate warning statement regarding flammability or explosive characteristics of the product are listed on the label?
Yes ☒ No ☐ Not applicable ☐

12e. The storage and disposal instructions for the pesticide and container are in compliance with PR Notice 84-1 for household use products or PR Notice 83-3 for all other uses? PR Notice 84-1 Yes ☐ No ☐ Not applicable ☒
PR Notice 83-3 Yes ☒ No ☐ Not applicable ☐

12f. Does the product require an expiration date at which time the NC falls below the LCL (based on the one year storage stability data or other information)?
Yes ☐ No ☐ Pending ☒

13a.

PRODUCT CHEMISTRY (Series 830 Part A)

	Acceptance of Information	MRID No.
830.1550 Chemical ID (See Appendix)	U	466829-01
830.1600 Description of Materials	U	466829-01
830.1620 Description of Production Process ²	U	466829-01
830.1650 Description of Formulation Process	U	466829-01
830.1670 Discussion of Impurities	U	466829-01
830.1700 Analysis ⁵	A	466829-02
830.1750 Certified Limits	N	466829-03
830.1800 Analytical Method for AIs	G	

no GLP req.

no GLP req.

no GLP req.

no GLP req.

no GLP req.

no GLP req.

Explanation: A=acceptable; N=not acceptable; NA=technically not applicable; NR= not required,

G=data gap; U=requires upgrading; W=waived; E=EPA estimate.

¹See Confidential Appendix A for additional information

²For MP/EP products produced by an integrated formulation system.

³For products from a TGAI or MP.

⁴May be waived unless actual/possible impurities are of toxicological concern.

⁵Five batch analysis required for products produced by an integrated formulation system.

⁶If different from standard CLS recommended in 40 CFR 158.175, this should be discussed in Confidential Appendix A.

⁷Abbreviate method used as follows: gas chromatography (GC), infrared (IR),

Physical and Chemical Characteristics (Series 830, Part 1)

13b. <u>Physical/Chemical Properties</u>	Acceptance of data	Value or qualitative description	MRID No.
830.6302 Color	A	Light brown	
830.6303 Physical State	A	Semi solid	
830.6304 Odor	A	Silane odor	
830.6313 Stability to normal & elevated temp., metals, & metal ions	NA		
830.6314 Oxidation/Reduction: chemical incompatibility.	A	No oxidizing agents	
830.6315 Flammability/Flash Pt	A	Flashpoint 44 °C	
830.6316 Explodability	A	Not explosive	
830.6317 Storage stability ¹	A	U	
830.6319 Miscibility	A	Not to be diluted with petroleum solvents	
830.6320 Corrosion characteristics ¹	A	U	
830.6321 Dielectric breakdown voltage	A	Not to be used around electrical equipment.	
830.7000 pH	A	4.7 (5% aqueous)	
830.7050 UV/Visible absorption	NA		
830.7100 Viscosity	A	11.2 cps @ 25°C	
830.7200 Melting point/melting range	NA		
830.7220 Boiling point/ boiling range	NA		
830.7300 Density/sp. gravity	A	8.03 WPG @ 25°C	
830.7370 Dissociation constants in water	NA		
830.7520 Particle size, fiber length, & diameter distribution	NA		
830.7550 Partition coefficient(n-octanol/water), shake flask method	NA		
830.7560 Partition coefficient(n-octanol/water), generator column method	NA		
830.7570 Partition coefficient(n-octanol/water),	NA		
830.7840 Water solubility: Column elution method; shake flask method	NA		
830.7860 Water solubility, generator column method	NA		
830.7950 Vapor pressure	NA		

Explanation: A=acceptable; N=not acceptable; NA=technically not applicable. ¹= Registrant must perform one year study. U=requires upgrading.

PRIA

DATA PACKAGE BEAN SHEET

Date: 05-Dec-2005

Page 1 of 1

Decision #: 362263

DP #: (324179)

5786185

*** Registration Information ***

Registration: 75174-U - SIS 7200

Company: 75174 - SISHIELD TECHNOLOGIES, INC.

Risk Manager: RM 31 - Velma Noble - (703) 308-6233 Room# CM-2 308B

Risk Manager Reviewer: Tracy Lantz TLANTZ

Sent Date: _____

Calculated Due Date: 21-Feb-2006

Edited Due Date: _____

Type of Registration: Product Registration - Section 3

Action Desc: (A53) ME-TOO;NEW PRODUCT;FAST TRACK;

Ingredients: 107401, 1-Octadecanaminium, N,N-dimethyl-N-(3-(trimethoxysilyl)propyl)-, chloride(72%)

*** Data Package Information ***

Expedite: ☐ Yes ☒ No

Date Sent: 05-Dec-2005

Due Back: _____

DP Ingredient: 107401, 1-Octadecanaminium, N,N-dimethyl-N-(3-(trimethoxysilyl)propyl)-, chloride

DP Title: _____

CSF Included: ☐ Yes ☒ No

Label Included: ☐ Yes ☒ No

Parent DP #: _____

Assigned To

Date In

Date Out

Organization: AD / PSB

12/10/05

Last Possible Science Due Date: 22-Jan-2006

Team Name: CTT

12/15/05

Science Due Date: 1/21/06

Reviewer Name: Juan

12/16/05

1/27/06

Sub Data Package Due Date: 1/7/06

Contractor Name: _____

*** Studies Sent for Review ***

No Studies

*** Additional Data Package for this Decision ***

No Additional Data Packages

*** Data Package Instructions ***

Karen - Please review product chemistry MRID's; 466829-01, 466829-02, 466829-03 and self certification form.

CSF, label, cover letter, appl. for pesticide and me-too label included.

*Note - CF does not appeal to agree with label.

Reviewer needs to review self cert
date back by 1.

**SiShield Technologies Inc.**

17 Executive Park Drive, Suite 563, Atlanta GA 30329
404.636.8900 / 404.636.8500 fax – email: contact_SiShield@msn.net

Ms. Velma Noble
Product Manager 31
Antimicrobials Division (7510W)
U.S. Environmental Protection Agency
Document Processing Desk (APPL)
Room 226A, Crystal Mall 2
1801 South Bell Street
Arlington, VA 22202-4501

31 Oct 2005

VIA FEDERAL EXPRESS

RE: SiShield Technologies, Inc. Product Renewal Registration for SiS 7200 (EPA Registration No. 75174-1) Re-submission of Application for "Me-too" Product Registration.

Dear Ms. Noble:

On behalf of SiShield Technologies, Inc. I am resubmitting a me-too application for a new MUP product SiS 7200 (EPA Registration No. 75174-1). The registration of this product was suspended in July 2005; therefore the same information in support of the registration is being resubmitted.

The product is substantially similar to BioShield Technologies' BSTI 1860 (trimethoxysilyl) propyl dimethyl octadecyl ammonium chloride (CPTMS: CAS #27668-52-6), EPA Registration No. ~~70871-12~~ *transferred to 75497-6*. SiShield Technologies is submitting its own product chemistry and is relying on the cite all method of support for all other required data. Letters have been sent by certified mail offering to pay compensation to related companies listing for CPTMS on the Data Submitters List.

As per PR Notice 86-5, five copies of the draft label for the basic formulation are included. We look forward to an expedited review as the same information is being submitted to support the renewal of the registration for SiS 7200 (EPA Registration No. 75174-1).

Sincerely,

Donna Weeden
Donna Weeden
Regulatory Agent

Enclosures

SiShield Technologies, Inc.
17 Executive Park Drive, Suite 563, Atlanta GA 30329
404.636.8900 / 404.636.8500 fax

TRANSMITTAL DOCUMENT

SUBMITTER

SiShield Technologies, Inc.
17 Executive Park Drive, Suite 563
Atlanta GA 30329

Donna Weeden*
310 Twin Brook Way
Lawrenceville, GA 30043

*Donna Weeden is the independent regulatory agent for SiShield Technologies, Inc.

Regulatory action in support of which this package is submitted:

Application for renewal of pesticide registration for
SiS 7200 (EPA Symbol file no. 75174-1)

Transmittal Date

31 October 2005

Contents

	Volume 1	Administrative Materials
46682901	Volume 2	Beginning Materials and Manufacturing Process and Discussion of the Formation of Impurities (OOPIS 830.1550, 830.1620, 830.1670: Guidelines 61-1, 61-2, 61-3)
46682902	Volume 3	Preliminary Analysis (Guideline 62-1; OPPTS 830.1700)
46682903	Volume 4	Certified Limits (Guideline 62-2; OPPTS 830.1750)

Company Regulatory Agent: Donna M. Weeden

Donna Weeden 31 Oct 2005

Company Regulatory Contact: 770-513-3906 / 404-271-7925

00
AS

VOLUME 4 OF 4

Study Title
SiS 7200 Certified Limits

DATA REQUIREMENTS

Guidelines 62-2, OPPTS 830.1750

Author
Donna Weeden
Regulatory Agent

Study Completion Date

18 October 2005

Sponsor
SiShield Technologies, Inc.
17 Executive Park Drive, Ste 563
Atlanta, GA 30392

CONFIDENTIALITY STATEMENT

No Claim of confidentiality is made for any information contained in this study on the basis of its falling within the scope of FIFRA 10 (d) (1) (A), (B), or (C).

Company: SiShield Technologies, Inc.

Company Regulatory Agent: Donna Weeden*

Signature: *Donna Weeden*

Date: *18 October, 2025*

***Donna Weeden is authorized as a regulatory agent for SiShield Technologies, Inc.**

GOOD LABORATORY PRACTICE STATEMENT

The data reported in this volume (Guideline 62-2) were not required to be conducted in accordance with EPA FIFRA Good laboratory Practice (GLP) standards as detailed under 40 CFR part 160.

Sponsor / Submitter: *Dona Weeden*

Date: *18 October 2005*

62-2 Certified Limits

I hereby certify that for the purpose of FIFRA section 12(a) (1) (C), the description of the composition of SiS 7200 refers to the composition set forth on the Statement of Formula and supporting materials. This description includes the representations that:

(1) no ingredient will be present in the product in the amount greater than the upper limit specified for that ingredient in a currently approved Statement of Formula; and (2) if the agency requires that the source of the supply of an ingredient be specified that all quantities of such ingredient will be obtained from the source specified in the Statement of Formula.

Donna Weeden*
Regulatory Agent

Signature: *Donna Weeden*

Date: *18 October 2005*

*Donna Weeden is the regulatory agent for SiShield Technologies, Inc.

PRIA

DATA PACKAGE BEAN SHEET

Date: 05-Dec-2005

Page 1 of 1

Decision #: 362263

DP #: (324179)

*** Registration Information ***

Registration: 75174-U - SIS 7200

Company: 75174 - SISHIELD TECHNOLOGIES, INC.

Risk Manager: RM 31 - Velma Noble - (703) 308-6233 Room# CM-2 308B

Risk Manager Reviewer: Tracy Lantz TLANTZ

Sent Date: _____

Calculated Due Date: 21-Feb-2006

Edited Due Date: _____

Type of Registration: Product Registration - Section 3

Action Desc: (A53) ME-TOO;NEW PRODUCT;FAST TRACK;

Ingredients: 107401, 1-Octadecanaminium, N,N-dimethyl-N-(3-(trimethoxysilyl)propyl)-, chloride(72%)

*** Data Package Information ***

Expedite: ☐ Yes ☒ No

Date Sent: 05-Dec-2005

Due Back: _____

DP Ingredient: 107401, 1-Octadecanaminium, N,N-dimethyl-N-(3-(trimethoxysilyl)propyl)-, chloride

DP Title: _____

CSF Included: ☐ Yes ☒ No

Label Included: ☐ Yes ☒ No

Parent DP #: _____

Assigned To

Date In

Date Out

Organization: AD / PSB

Last Possible Science Due Date: 22-Jan-2006

Team Name: CTT

Science Due Date: _____

Reviewer Name: _____

Sub Data Package Due Date: _____

Contractor Name: _____

*** Studies Sent for Review ***

No Studies

*** Additional Data Package for this Decision ***

No Additional Data Packages

*** Data Package Instructions ***

Karen - Please review product chemistry MRID's; 466829-01, 466829-02, 466829-03 and self certification form.
CSF, label, cover letter, appl. for pesticide and me-too label included.

*Note - CF does not appeal to agree with label.

TASK ASSIGNMENT FORM
Antimicrobial Division/Regulatory Management Branch II

A	Completed by Product Manager						
PRODUCT REVIEWER: <u>Tracy Lantz</u>						RMB <u>I</u> TEAM <u>31</u>	
Description of Action: <u>New Application for Registration</u>						EPA File Symbol/Reg No. <u>75174-U</u>	
Decision No. <u>362263</u>		Submission No. <u>786185</u>		Fee for Service Action Code: <u>A53</u>			
FQPA Action Code: _____		Non-FQPA Action Code: _____		Fee for Service Fee: \$ <u>1050</u>			
		MONTH	DAY	YEAR			
APPLICATION DATE		10	31	2005			
EPA PIN DATE		11	2	2005			
REVIEWER ASSIGNED DATE		11	22	2005			
DATE DUE FROM SCIENCE		1	21	2005 2006			
DATE DUE TO PM		2	21	2005 2006			
Type of Data:	PSB Product Chemistry <input checked="" type="checkbox"/>	PSB Acute Toxicology <input type="checkbox"/>	PSB Efficacy <input type="checkbox"/>	RASSB Environmental Fate <input type="checkbox"/>	RASSB Ecological Effects <input type="checkbox"/>	RASSB Chronic Toxicology <input type="checkbox"/>	RASSB Exposure <input type="checkbox"/>
<p>COMMENTS: NOTE TO ARCTIC SLOPE - PLEASE COMPLETE PART B OF FORM.</p> <p>Karen: Please review product chemist MRID's: 466829-01, 466829-02, 466829-03 and self certification form.</p> <p>CSF, label, cover letter, appl. for pesticide and me-too label included.</p> <p>* Note - CSF does not appear to agree with label.</p>							
ATTACHMENTS: <input checked="" type="checkbox"/> LABELING <input checked="" type="checkbox"/> CSF(S) <input checked="" type="checkbox"/> DATA <input type="checkbox"/> OTHERS							
B	For Arctic Slope Contract Only						
Contractor: Arctic Slope				Contract No.: 0332		ARCTIC SLOPE/MANAGER	
Draft Task: Signature _____ (Est. hrs)				Final Task: Signature _____ (Total hrs)			
C	Reviewer's Comments:						
DATE FEE PAID: _____				RESPONSE CODE: _____ RESPONSE DATE: _____			



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
1200 Pennsylvania Avenue, N.W.
WASHINGTON, D.C. 20460

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for reregistration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, Collection Strategies Division (28221), U.S. Environmental Protection Agency, 1200 Pennsylvania Avenue, N.W., Washington, DC 20460. Do not send the form to this address.

**SELF-CERTIFICATION STATEMENT FOR THE
 PHYSICAL/CHEMICAL PROPERTIES (PR NOTICE 98-1)**

Product Name: SIS 720 (Basic formulation with methanol)

Reg. No./File Symbol No. 75174-
 (if known) or **Company No.**

SELF-CERTIFICATION STATEMENT:

I certify that the reported information on the "Summary Form" represents a true and accurate record of the test results of studies generated or owned by (Company Name): SiShield Technologies, Inc.

and that the values of the properties reported are reliable.

I further certify that such data were generated in substantial conformity with OPPTS Test Guideline Series 830 Product Properties, applicable to my product, and in effect at the time of submission.

As a condition of registration, EPA may, by order, (1) withdraw a pending registration, (2) suspend the registration of this product without opportunity for hearing, or (3) assess civil penalties provided for in section 14 of FIFRA for violations of section 12(a)(2)(N) of FIFRA without opportunity for hearing, if I have not submitted to EPA within thirty (30) days of receipt of a request by the Agency, or within a specified time agreed to by the Agency, test results of studies summarized in the "Summary Form."

As a condition of registration, EPA may, by order, (1) withdraw a pending registration, (2) suspend the registration of this product without opportunity for hearing, or (3) assess civil penalties provided for in section 14 of FIFRA for violations of sections 12(a)(2)(N), 12(a)(2)(Q), or 12(a)(2)(R) of FIFRA without opportunity for hearing, if I fail to provide to EPA within thirty (30) days of receipt of a notification of error, or within a specified time agreed to by the Agency, information that EPA determines is required to correct the error.

Type Applicant's Name:

Dr. Marcelo Vilahoz

Title: President SiShield Technologies, Inc.

Telephone No.

404-636-8900

Applicant's Signature:

Date:

10/31/05

EPA Form 8570-37 (12-2003)

Attach-2



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
1200 Pennsylvania Avenue, N.W.
WASHINGTON, D.C. 20460

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 1 hour per response for registration activities and 1 hour per response for reregistration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, Collection Strategies Division (2822T), U.S. Environmental Protection Agency, 1200 Pennsylvania Avenue, N.W., Washington, DC 20460. Do not send the form to this address.

SUMMARY OF THE PHYSICAL/CHEMICAL PROPERTIES (PR Notice 98-1)

1. PRODUCT NAME: SiS 7200		2. Reg. No. 75174-1
3. COMPANY NAME: SiShield Technologies, Inc.		4. SUBMISSION DATE 31 Oct 2005
5. FIRST SUBMISSION <input type="checkbox"/> 6. RESUBMISSION <input checked="" type="checkbox"/>	7. PESTICIDE TYPE: Antimicrobial	10. REGISTRATION <input checked="" type="checkbox"/>
8. FORMULATED MANUFACTURING-USE PRODUCT <input checked="" type="checkbox"/> or 9. END-USE PRODUCT <input type="checkbox"/>		11. REREGISTRATION <input checked="" type="checkbox"/>
13. PRODUCT MANAGER/CHEMICAL REVIEW MANAGER #/NAME (IF KNOWN): Velma Noble PM 31		12. REREG CASE #
14. GUIDELINE REFERENCE NO. (GRN)/TITLE	15. VALUE or QUALITATIVE DESCRIPTION/METHOD(S) USED WHERE APPLICABLE AND REFERENCES	16. MRID or REPORT NO.
-6302 Color	light brown	Report No. 3001
-6303 Physical State	semi solid at room temperature	Report No. 3001
-6304 Odor	Silane odor	Report No. 3001
-6314 Oxidation/Reduction: Chemical Incompatibility	Product contains no oxidizing agents	
-6315 Flammability/Flame Extension	Flashpoint 44 degrees centigrade (Pensky Martin)	Report No. 3001
-6316 Explodability	Product is not explosive	
-6317 Storage Stability	Interim results show stable at room temp. for 30 days	
-6319 Miscibility	Product will not be diluted with petroleum solvents	
-6320 Corrosion Characteristics	Not corrosive	
-6321 Dielectric Breakdown Voltage	Not applicable-product not to be used around electric	
-7000 pH	4.7(5% aqueous) variable depend on amine remain	Report No. 3001
-7100 Viscosity	11.2 cps@25 C (Brookfield LVDV II Viscometer)	Report No. 3001
-7300 Density/Relative Density/Bulk Density	8.03 WPG @ 25 C	Report No. 3001



MATERIAL SAFETY DATA SHEET

SIS 7200

MSDS DATE: 10/07/05

SECTION 1: PRODUCT AND COMPANY IDENTIFICATION

PRODUCT NAME: SiShield SiS 7200
SYNONYMS: SiS 7200 (basic formulation in methanol)

MANUFACTURER: SiShield Technologies, Inc.
DIVISION: Research and Development
ADDRESS: 17 Executive Park Drive, Suite 563
Atlanta GA 30392

EMERGENCY TELEPHONE NUMBER (CHEMTREC): 1-800-424-9300
NON-EMERGENCY TELEPHONE NUMBER: 1-404.636.8900
FAX PHONE: 1.404.636.8500

SECTION 2: COMPOSITION/INFORMATION ON INGREDIENTS

<u>HAZARDOUS INGREDIENTS:</u>	<u>CAS NO.</u>	<u>TWA</u>	<u>STEL</u>
3-(Trimethoxysilyl) propyldimethyloctadecyl ammonium chloride	27668-52-6	none established	none established
Methyl Alcohol	67-56-1	200 ppm	250 ppm
Chloropropyl trimethoxysilane	2530-87	0.1 ppm	none established

SECTION 2 NOTES: Methyl alcohol forms on contact with water or humid air. Provide adequate ventilation to control exposures within guidelines of OSHA PEL: TWA 200 ppm and ACGIH TLV-skin: TWA 200 ppm, STEL 250 ppm.

The above information is not intended for use in preparing product specifications.

SECTION 3: HAZARDS IDENTIFICATION

EMERGENCY OVERVIEW: DANGER! METHYL ALCOHOL MAY CAUSE BLINDNESS. CAUSES IRREVERSIBLE EYE DAMAGE. DO NOT GET IN EYES OR ON CLOTHING. HARMFUL OR FATAL IF SWALLOWED. HARMFUL IF ABSORBED THROUGH SKIN OR INHALED. AVOID CONTACT WITH SKIN. AVOID BREATHING VAPORS OR MIST. FLAMMABLE.

ROUTES OF ENTRY: Inhalation, Skin Contact, Ingestion, Eye Contact

SECTION 3: HAZARDS IDENTIFICATION CONTINUED

POTENTIAL HEALTH EFFECTS

EYES: Direct contact burns eyes with possible permanent injury, even blindness.



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- SKIN:** A single, relatively short exposure (less than 24 hours) irritates. Repeated prolonged contact (24 to 48 hours) irritates seriously, may burn mildly. Overexposure by skin absorption may injure the following organ(s): kidneys, bladder.
- INGESTION:** If swallowed, blindness, even death may result due to methyl alcohol poisoning.
- INHALATION:** Short vapor exposure may cause drowsiness, irritate nose and throat, and cause injury to the following organ(s): liver, kidney, bladder, nervous system, and adrenals. Overexposure to vapor may cause blindness and nervous system effects due to methyl alcohol poisoning.

MEDICAL CONDITIONS GENERALLY AGGRAVATED BY EXPOSURE: Not known

CARCINOGENS:

OSHA: No

ACGIH: No

NTP: No

IARC: No

MUTAGENS: not known

SECTION 4: FIRST AID MEASURES

EYES: Hold eyelids open and flush with a steady, gentle stream of water for 15 minutes. Seek medical attention.

SKIN: Flush skin thoroughly with water for at least 15 minutes. Wash with plenty of soap and water. Seek medical attention.

INGESTION: Seek medical attention. Do not induce vomiting or give anything by mouth to an unconscious person. Drink promptly a large quantity of milk, egg whites, gelatin solution, or, if these are not available, drink large quantities of water. Avoid alcohol.

INHALATION: Move person to fresh air. If not breathing, give artificial respiration. Seek medical attention.

NOTES TO PHYSICIANS OR FIRST AID PROVIDERS: Probable mucosal damage may contraindicate the use of gastric lavage.

SECTION 5: FIRE-FIGHTING MEASURES

FLAMMABLE LIMITS IN AIR,

UPPER: Not determined

LOWER: Not determined

FLASH POINT:

F: 93.02°

C: 33.9°

METHOD USED: Pensky-Martens Closed Tester Method

EXTINGUISHING MEDIA: Carbon dioxide (CO₂), water fog (or spray), dry chemical, or foam.

SPECIAL FIRE FIGHTING PROCEDURES: Self-contained breathing apparatus and protective clothing should be worn in fighting fires involving chemicals. Heat



MATERIAL SAFETY DATA SHEET

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exposure pressurizes closed containers. Cool with water spray.
Evacuate area in case of overheating fire.

UNUSUAL FIRE AND EXPLOSION HAZARDS: Vapors are heavier than air and can travel along the ground to remote ignition sources. Static electricity may accumulate and ignite vapors. Prevent a possible fire hazard by suitable means, such as, bonding and grounding, inert gas purge, vapor dilution, and the like.

HAZARDOUS DECOMPOSITION PRODUCTS: Thermal breakdown of this product during fire or very high heat conditions may evolve the following hazardous decomposition products: chlorine compounds, carbon oxides and traces of incompletely burned carbon compounds, nitrogen oxides, silicon dioxide, and formaldehyde.

SECTION 6: ACCIDENTAL RELEASE MEASURES

ACCIDENTAL RELEASE MEASURES:

Disposal of collected product, residues, and clean-up materials may be governmentally regulated. Observe all applicable local, state, and federal waste management regulations. Remove possible ignition sources and if needed, use non-sparking tools and equipment. To prevent possible spontaneous combustion, store rags, mops, absorbent, etc., used during clean up only in appropriate containers or covered with water. Determine whether to evacuate or isolate the area depending on such specific factors as site location, population density, traffic flow, size of the release or spill, weather conditions, the material's hazards and risk to people, and whether a fire is underway or possible. Mop, wipe, or soak up with absorbent and contain for salvage or disposal. For large spills, provide diking or other appropriate containment to keep material from spreading. Clean any remaining slippery surfaces by appropriate techniques, such as: several moppings or swabbings with appropriate solvents; washing with mild, caustic detergents or solutions, or high pressure steam for large areas. For non-silicones, use typical industrial cleaning materials. Observe any safety precautions applicable to the cleaning material being used. Local, state, and federal reporting requirements may be apply to spills or releases of this material into the environment. See applicable regulatory compliance information in Section 15.

SECTION 6 NOTES: See Section 8 for Personal Protective Equipment for Spills.

SECTION 7: HANDLING AND STORAGE

HANDLING: Wear appropriate personal protective equipment. (See Section 8)

STORAGE: Keep container closed and away from heat, sparks, and open flame. Keep container closed and store away from water and moisture.

OTHER PRECAUTIONS: Store in original closed container in a secure area inaccessible to children and away from food or feed.

SECTION 8: EXPOSURE CONTROLS/PERSONAL PROTECTION

ENGINEERING CONTROLS:



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SIS 7200

Local exhaust: Recommended

General Ventilation: Recommended

MSDS DATE: 10/07/05

RESPIRATORY PROTECTION: Use respiratory protection unless adequate local exhaust ventilation is

provided or air sampling data show exposures are within recommended exposure guidelines. Industrial Hygiene Personnel can assist in judging the adequacy of existing engineering controls. A suitable respirator would be a self-contained breathing apparatus (SCBA) or other supplied respirator.

SECTION 8: EXPOSURE CONTROLS/PERSONAL PROTECTION CONTINUED

EYE PROTECTION: Wear protective eyewear (goggles, face shield, or safety glasses with side shields).

SKIN PROTECTION: Chemical protective gloves are recommended. (suitable gloves: SilverShield® 4H® Viton®)

SECTION 9: PHYSICAL AND CHEMICAL PROPERTIES*

APPEARANCE: Liquid

ODOR: Mild-sweet soap

PHYSICAL STATE: Cloudy, slightly viscous liquid at 72.68 °F

pH: 5.29

BOILING POINT:

F: 149°

C: 65°

MELTING POINT:

F: not applicable

C: not applicable

FREEZING POINT:

F: 28°

C: -2.2°

VAPOR PRESSURE (mmHg) @ 77°F: 100.00 Hg

DENSITY: 0.958 g/ml at 68° F

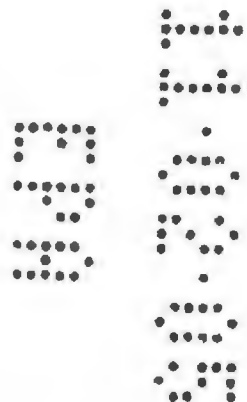
SPECIFIC GRAVITY @ 77° F: 0.96

EVAPORATION RATE: Not available

SOLUBILITY IN WATER: >90.00%

PERCENT VOLATILE: 12%

VISCOSITY: 109 mPa·s at 68 ° F
41.4 mPa·s at 104° F





MATERIAL SAFETY DATA SHEET

SIS 7200

MSDS DATE: 10/07/05

SECTION 9 NOTES: The above information is not intended for use in preparing product specifications.

SECTION 10: STABILITY AND REACTIVITY

STABILITY: Stable

CONDITIONS TO AVOID (STABILITY): None

INCOMPATIBILITY (MATERIAL TO AVOID): Oxidizing material can cause a reaction.

HAZARDOUS POLYMERIZATION: Hazardous polymerization will not occur

SECTION 10 NOTES: Water, moisture, or human air can cause hazardous vapors to form as described in Section 2.

SECTION 11: TOXICOLOGICAL INFORMATION

ROUTES OF ENTRY: Inhalation, Skin Contact, Ingestion, Eye Contact

TOXICITY TO ANIMALS:

Acute oral toxicity (LD50): 12.27g/kg [Rat]

Acute dermal toxicity (LD50): >7.95g/kg [Rabbit]

Eye Irritation: Corrosive to eyes [Rabbit]

Skin Irritation: Moderate irritation [Rabbit]

Acute Inhalation Toxicity(LC50): >0.45mg/L 4 hour(s) [Rat]

CHRONIC EFFECTS IN HUMANS:

Very hazardous in case of ingestion or inhalation.

Hazardous in case of skin contact (irritant), of eye contact (irritant).

SECTION 11 NOTES: The above listed toxicological information is based on actual data, results of studies performed upon a product with the same active ingredient. (EPA Registration No. 34292-1.)

SECTION 12: ECOLOGICAL INFORMATION

ECOLOGICAL INFORMATION:

This pesticide is toxic to fish. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans, or other waters unless in accordance with requirements of the National Pollutant Discharge Elimination System (NPDES) permit and permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product into sewer systems without



MATERIAL SAFETY DATA SHEET

SIS 7200

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previously notifying the local sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the EPA.

SECTION 13: DISPOSAL CONSIDERATIONS

WASTE DISPOSAL METHOD: Do not contaminate water, food, or feed by storage and disposal. If these wastes cannot be disposed of by use according to the label instructions, contact your State Pesticide or Environmental Control Agency or the Hazardous Waste Representative at the nearest EPA regional office for guidance.

RCRA HAZARD CLASS: (40 CFR 261)

SECTION 13 NOTES: Container disposal: (*plastic*) Triple rinse (or equivalent), then offer for recycling or reconditioning, puncture and dispose of in a sanitary landfill, incineration, or by burning (if allowed by the state and local authorities). If burned, stay out of smoke. (*metal*) Triple rinse (or equivalent), then offer for recycling or reconditioning, puncture and dispose of in a sanitary landfill, incineration, or by other procedures approved by state and local authorities. (*glass*) Triple rinse (or equivalent), then dispose of in a sanitary landfill or by other approved state and local procedures.

SECTION 14: TRANSPORT INFORMATION

U.S. DEPARTMENT OF TRANSPORTATION

DOT Information (45 CFR 172.101)

PROPER SHIPPING NAME: FLAMMABLE LIQUID, N.O.S.

HAZARD CLASS: 3

UN/NA NUMBER: UN1993

PACKING GROUP: II

SECTION 14 NOTES: None

SECTION 15: REGULATORY INFORMATION

U.S. FEDERAL REGULATIONS

TSCA (Toxic Substances Control Act) Status: All components of this product are listed on the TSCA inventory of chemical substances.

CERCLA (COMPREHENSIVE RESPONSE COMPENSATION, AND LIABILITY ACT):

Methyl alcohol 5000.00 LB RQ

311/312 HAZARD CATEGORIES:

Acute: Yes

Chronic: Yes

Fire: Yes

Pressure: No

Reactive: No



MATERIAL SAFETY DATA SHEET

SIS 7200

MSDS DATE: 10/07/05

313 REPORTABLE INGREDIENTS: Methyl alcohol

STATE REGULATIONS:

California

Warning: This product contains the following chemical(s) listed by the State of California under the Safe Drinking Water and Toxic Enforcement Act of 1986 (Proposition 65) as being known to cause cancer.

Not known

Warning: This product contains the following chemical(s) listed by the State of California under the Safe Drinking Water and Toxic Enforcement Act of 1986 (Proposition 65) as being known to cause birth defects or other reproductive harm.

Not known

Massachusetts

Methyl alcohol

New Jersey

3-(Trimethoxysilyl) propyldimethyloctadecyl ammonium chloride

Methyl Alcohol; #1222

Chloropropyl trimethoxysilane

Dimethyl octadecylamine

Pennsylvania

3-(Trimethoxysilyl) propyldimethyloctadecyl ammonium chloride

Methyl Alcohol

Chloropropyl trimethoxysilane

SECTION 16: OTHER INFORMATION

PREPARATION INFORMATION: Prepared by SiShield Technologies

DISCLAIMER: This information is offered in good faith as typical values and not as a product specification. No warranty, expressed or implied is hereby made. The recommended industrial hygiene and safe handling procedures are believed to be generally applicable. However, each user should review these recommendations in the specific context of the intended use and determine whether they are appropriate.



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End Use

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Certification with Respect to Citation of Data

Applicant's/Registrant's Name, Address, and Telephone Number
 SISnald Technologies, Inc. 17 Executive Park Drive Suite 503 Atlanta, GA 30382 (404-638-8500)

EPA Registration Number/File Symbol
 75174 - U

Active ingredient(s) and/or representative test compound(s)
 3-(trimethoxysilyl) propyltrimethyl ammonium chloride

Date 12/06/05

General Use Pattern(s) (list all those claimed for this product using 40 CFR Part 158)
 antimicrobial (materials preservative)

Product Name
 816 7200

NOTE: If your product is a 100% repackaging of another purchased EPA-registered product labeled for all the same uses on your label, you do not need to submit this form. You must submit the Formulator's Exemption Statement (EPA Form 8570-27).

☐ I am responding to a Data-Call-In Notice, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).

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☒ I am using the selective method of support (or data-all option under the selective method), and have included with this form a completed list of data requirements (the Data Matrix form must be used).

SECTION II: GENERAL OFFER TO PAY

(Required if using the data-all method or when using the data-all option under the selective method to satisfy one or more data requirements)

☒ I hereby offer and agree to pay compensation, to other persons, with regard to the approval of this application, to the extent required by FIFRA.

SECTION III: CERTIFICATION

I certify that this application for registration, this form for reregistration, or this Data-Call-In response is supported by all data submitted or cited in the application for registration, the form for reregistration, or the Data-Call-In response. In addition, if the data-all option or data-all option under the selective method is indicated in Section I, this application is supported by all data in the Agency's files that (1) concern the properties or effects of this product or an identical or substantially similar product, or one or more of the ingredients in this product; and (2) is a type of data that would be required to be submitted under the data requirements in effect on the date of approval of this application if the application sought the initial registration of a product of identical or similar composition and uses.

I certify that for each exclusive use study cited in support of this registration or reregistration, that I am the original data submitter or that I have obtained the written permission of the original data submitter to cite that study.

I certify that for each study cited in support of this registration or reregistration that is not an exclusive use study, either: (a) I am the original data submitter; (b) I have obtained the permission of the original data submitter to use the study in support of this application; (c) all periods of eligibility for compensation have expired for the study; (d) the study is in the public literature; or (e) I have notified in writing the company that submitted the study and have offered (i) to pay compensation to the extent required by sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA; and (ii) to commence negotiations to determine the amount and terms of compensation, if any, to be paid for the use of the study.

I certify that in all instances where an offer of compensation is required, copies of all offers to pay compensation and evidence of their delivery in accordance with sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA are available and will be submitted to the Agency upon request. Should I fail to produce such evidence to the Agency upon request, I understand that the Agency may initiate action to deny, cancel or suspend the registration of my product in conformity with FIFRA.

I certify that the statements I have made on this form and all attachments to it are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

Signature

Date

12/6/05

Typed or Printed Name and Title

Jacquelyn E. Berry, CEO

EPA Form 8570-34 (12-2003) Electronic and Paper versions available. Submit only Paper version.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

401 M Street, S.W.
Washington, D.C. 20460Product
Specific

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DATA MATRIX

Date 03 Dec 2005	EPA Reg No. / File Symbol 75174-1	Page 1 of 3
Applicant's/Registrant's Name & Address SiShield Technologies, Inc. 17 Executive Park Drive, Suite 563 Atlanta, GA 30392		Product SiS 7200

Ingredient SiS 7200 contains P.C. 107401

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
830.1550	Prod. Identity & composition	466829-01	SiShield Technologies, Inc.	OWN	
830.1600	Desc. Of beginning materials	466829-01	"	"	
830.1650	Desc. Of formulation process	466829-01	"	"	
830.1670	Disc. Of form. Of impurities	466829-01	"	"	
830.1700	Preliminary Analysis	466829-02	"	"	
830.1750	Certified limits	466829-03	"	"	
830.6302	Color	466829-03	"	"	
830.6303	Physical state	466829-03	"	"	
830.6304	Odor	466829-03	"	"	
830.6315	Flammability	466829-03	"	"	
830.6317	Storage stability	466829-03	"	"	
830.6320	Corrosion characteristics	466829-03	"	"	
830.7000	pH	466829-03	"	"	
830.7100	Viscosity	466829-03	"	"	
830.7300	Density/bulk den./rel. den.	466829-03	"	"	
			"	"	
			"	"	
Signature	Donna Weeden			Name and Title Donna M. Weeden, Agent for SiShield Technologies	Date 03 Dec 2005

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401 M Street, S.W.
Washington, D.C. 20460*Product Specific*

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DATA MATRIX

Date <u>29 Jan 2006</u>			EPA Reg No. / File Symbol <u>75174-U</u>		Page <u>2</u>
Applicant's/Registrant's Name & Address SiShield Technologies, Inc. 17 Executive Park Drive, Suite 563 Atlanta, GA 30392			Product <u>SiS 7200</u>		
Ingredient (3-trimethoxysilyl) propyldimethyl ammonium chloride SiS 7200 contains P.C. 107401					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
870.1100	Acute Oral toxicity	42456511	Aegis Environmental <u>64881-2</u>	Old	
870.1200	Acute Dermal toxicity	43219901	Aegis Environmental <u>64881-2</u>	Old	
870.1300	Acute Inhalation toxicity	Cite all	Cite all	Pay	
870.2400	Primary Eye Irritation	40385201	Aegis Environmental	Old	
870.2500	Primary Dermal Irritation	42456513	Aegis Environmental <u>64881-2</u>	Old	
870.2600	Dermal Sensitization	Cite all	Cite all	Pay	
8700.000 Series	Acute Toxicology	40385201	Aegis Environmental	Old	
Signature <u>Donna Weeden</u>			Name and Title Donna M. Weeden, Agent for SiShield Technologies		Date <u>29 Jan 2006</u>

SiS 7200 (75174-U)

Listing of Companies that have data on file to support active ingredient 3-trimethoxysilyl propyl dimethyl-octadecyl ammonium chloride.

**Aegis Environmental Management
2205 Ridgewood Drive
Midland, MI 48642-5884**

**Nalco Diversified Technologies
7145 Pine St
Chagrin Falls, OH 44022-3401**

**Goulston Technologies, Inc.
700 N. Johnson St.
Monroe, NC 28110**

**American Chemistry Council Biocides Panel
1300 Wilson Blvd
Arlington, VA 22209**

**Spray Drift Task Force
1900 K Street NW
Midland, MI 48642**

**BioShield Technologies, Inc.
4405 International Blvd, Ste. B-109
Norcross, GA 30093**

**SiShield Technologies, Inc.
5555 Glenridge Connector, Suite 200
Atlanta, GA 30342**

**Marinize Products, Inc.
Shenstone Est. 17804 Braemar Place
Leesburg, VA 20176**

**Jennico2 Inc.
4494 Anderson Drive
Eau Claire, WI 54703**

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401 M Street, S.W.

Washington, D.C. 20460

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DATA MATRIX

Date 03 DEC 2005 EPA Reg No. / File Symbol 75174- Page 1 of 1

Applicant's/Registrant's Name & Address
SiShield Technologies, Inc.
17 Executive Park Drive, Suite 563
Atlanta, GA 30392

Product SiS 7200

Ingredient SiS 7200 contains P.C. 107401

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
			SiShield Technologies, Inc.	OWN	
			"	"	
			"	"	
			"	"	
			"	"	
			"	"	
			"	"	
			"	"	
			"	"	
			"	"	
			"	"	
			"	"	
			"	"	
			"	"	
			"	"	

Signature

Donna M. Weeden

Name and Title

Donna M. Weeden, Agent for SiShield Technologies

Date

03 Dec 2005

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401 M Street, S.W.
Washington, D.C. 20460*Product Specific*

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			Aegis Environmental	Old	
			Aegis Environmental	Old	
			Cite all	Pay	
			Aegis Environmental	Old	
			Aegis Environmental	Old	
			Cite all	Pay	
			Aegis Environmental	Old	
Signature	<i>Donna Weeden</i>		Name and Title Donna M. Weeden, Agent for SiShield Technologies	Date	<i>2/9/2006</i>

Sis 7200 (75174-U)

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Jennico2 Inc.
4494 Anderson Drive
Eau Claire, WI 54703



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

1200 Pennsylvania Avenue, N.W.

WASHINGTON, D.C. 20460

Generic

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SiShield Technologies, Inc. 17 Executive Park Drive, Ste 563 Atlanta, GA 30392

EPA Registration Number/File Symbol
75174- U

Active Ingredient(s) and/or representative test compound(s)
3-(trimethoxysilyl) propyldimethyl octadecyl ammonium chloride

Date
10/31/05

General Use Pattern(s) (list all those claimed for this product using 40 CFR Part 158)
materials preservative (antimicrobial)

Product Name
SIS 7200

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☒ I hereby offer and agree to pay compensation, to other persons, with regard to the approval of this application, to the extent required by FIFRA.

SECTION III: CERTIFICATION

I certify that this application for registration, this form for reregistration, or this Data-Call-In response is supported by all data submitted or cited in the application for registration, the form for reregistration, or the Data-Call-In response. In addition, if the cite-all option or cite-all option under the selective method is indicated in Section I, this application is supported by all data in the Agency's files that (1) concern the properties or effects of this product or an identical or substantially similar product, or one or more of the ingredients in this product; and (2) is a type of data that would be required to be submitted under the data requirements in effect on the date of approval of this application if the application sought the initial registration of a product of identical or similar composition and uses.

I certify that for each exclusive use study cited in support of this registration or reregistration, that I am the original data submitter or that I have obtained the written permission of the original data submitter to cite that study.

I certify that for each study cited in support of this registration or reregistration that is not an exclusive use study, either: (a) I am the original data submitter; (b) I have obtained the permission of the original data submitter to use the study in support of this application; (c) all periods of eligibility for compensation have expired for the study; (d) the study is in the public literature; or (e) I have notified in writing the company that submitted the study and have offered (i) to pay compensation to the extent required by sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA; and (ii) to commence negotiations to determine the amount and terms of compensation, if any, to be paid for the use of the study.

I certify that in all instances where an offer of compensation is required, copies of all offers to pay compensation and evidence of their delivery in accordance with sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA are available and will be submitted to the Agency upon request. Should I fail to produce such evidence to the Agency upon request, I understand that the Agency may initiate action to deny, cancel or suspend the registration of my product in conformity with FIFRA.

I certify that the statements I have made on this form and all attachments to it are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

Signature

Date

10/31/05

Typed or Printed Name and Title

Dr. Marcelo Vilahoz, President



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W.
WASHINGTON, D.C. 20460

Form Approved OMB No. 2070-0060

Generic

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for reregistration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (2137), U.S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20460. Do not send the form to this address.

DATA MATRIX

Date 01 June 2006

EPA Reg No/File Symbol 75174-U

Page of 1 of 2

Applicant's/Registrant's Name & Address

Product

SiShield Technologies
17 Executive Park Drive Suite 563 Atlanta, GA 30329

SiS 7200

Ingredient: SiS 7200 contains PC Code 107401 **Generic Data for 3-(trimethoxysilyl) propyldimethyl - octadecyl ammonium chloride (PC code107401)**

[illegible]

Signature _____

Donna Under

Name and Title

Donna Weeden Regulatory Agent

Date _____

01 June 2008



Just Me
<weedenat12004@yahoo.com>

>

11/30/2005 09:55 AM

To Tracy Lantz/DC/USEPA/US@EPA

cc

bcc

Subject review time for 75174-U (SiS 7200) SiShield Technologies, Inc.

Hello Tracy,

I hope you had a good Holiday. As stated in our conversation last week I am following up with you to see if you were able to find the remaining pieces of the submission for SiS 200 (75174-U). You stated you were missing an application, labels, etc. All of this information was sent in.

Were you able to locate the rest of the package for review? Please let me know so I can make arrangements to send you what you need if you cannot locate them. Also if you do have it all can you let me know if it is at all possible to complete the review prior to the standard 90 day period given the fact that this exact package was submitted previously?

I look forward to your reply.

Warm regards,
Donna Weeden
Regulatory Agent
SiShield Technologies, Inc.

770 513
3906

Yahoo! Music Unlimited
Access over 1 million songs. Try it free.
<http://music.yahoo.com/unlimited/>

Call her
about
missing
items
and time
frame - 90 days
must send
to chemist

will go for
review

address
fee issue

answered
these questions
in message
I left
on 12/1/05

70871-12

5-30-0002

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

1/5

me - too
label

MAY 30 2002

Ms. Donna Ross
Regulatory Agent
BioShield Technologies, Inc.
4405 International Boulevard, Suite #109
Norcross, GA 30093

Subject: BioShield BSTI 1860
EPA Registration No: 70871-12
Application Date: February 1, 2002
Receipt Date: February 6, 2002

Dear Ms. Donna Ross:

The following amendment, submitted in connection with registration under section 3 (c) (7) (A) of the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, is acceptable with the conditions listed below:

new use of this active ingredient as a spray on dried latex paints (indoor and outdoor), stains, coatings, films, laminates and finishes as well as directly added into can paints as a preservative to control growth of odor causing bacteria, mold, mildew and algae.

Conditions

You have provided additional information regarding the paint use such that your product may be applied to dried paints and coatings which have been previously applied to "...architectural structures and buildings, interior and exterior walls of buildings, domestic structures and buildings, textiles, wood and concrete structures." Your proposed language is not specific enough and we have not received additional clarification as per our request of 5/24/02.

You had previously requested that this submission be expedited and due to this request, we have decided to approve the label text which is acceptable at this time such that you may market this product. You may submit a new request (which will be processed as a new submission) to clarify that language which is not acceptable at this time.

Your proposed statement is still too broad:

*the site textiles must be deleted as it is not appropriate to apply a paint to a textile

	surface	CONCURRENCES					
SYMBOL	7510C						
SURNAME	J. Smith						
DATE	5/29/02						

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

2/5

- *domestic structures and buildings is also too broad (specific surfaces: walls, ceilings must be listed, i.e. need additional clarification)
- *wood and concrete structures is also too broad (what specifically made of wood and concrete?)

Thus all directions and claims for the use of this product to be applied to paint film and coating film must be deleted.

Revise the label as follows:

1. Revise page two by deleting the entire section beginning: "BSTI 1860 is for use in formulating products to be applied to the dried. " and ending "...and copolymers thereof."
2. Revise the statement at the end of page three to read as follows: "Note: Any claims for paint use must be for the preservation of the paint in the can." and deleting: "or protection of the paint film only."

General Comments

A stamped copy of the accepted labeling is enclosed. Submit one (1) copy of your final printed labeling before distributing or selling the product bearing the revised labeling.

Submit and/or cite all data required for registration/reregistration of your product under FIFRA section 3(c)(5) and section 4(a) when the Agency requires all registrants of similar products to submit such data.

If the above conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6(e). Your release for shipment of the product bearing the amended labeling constitutes acceptance of these conditions.

Should you have any questions or comments concerning this letter, please contact Tracy Lantz at (703) 308-6415.

Sincerely,

Velma Noble

Velma Noble

Product Manager (31)

Regulatory Management Branch I

Antimicrobials Division (7510C)

Enclosure: Stamped Label

7510C:T.Lantz:5/29/02:708/1-12h

CONCURRENCES

SYMBOL	7510C							
SURNAME	J. Lantz							
DATE	5/24/02							

STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage and disposal.

Pesticide Storage: Store in original closed containers in a secure area inaccessible to children and away from food or feed.

Pesticide Disposal: Pesticide wastes are toxic. Improper disposal of excess pesticide, spray mixture or rinsate is a violation of Federal law. If these wastes cannot be disposed of by use according to the label instructions, contact your State Pesticide or Environmental Control Agency or the Hazardous Waste Representative at the nearest EPA regional office for guidance.

Container Disposal: (plastic) Triple rinse (or equivalent), then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or incineration or, if allowed by state and local authorities, by burning. If burned, stay out of smoke. (metal) Triple rinse (or equivalent), then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or incineration or, other procedures approved by state and local authorities. (glass) Triple rinse (or equivalent), then dispose of in a sanitary landfill or by other approved State and local procedures.

PHYSICAL OR CHEMICAL HAZARDS

Combustible. Do not use or store near heat or open flame. De-activation of BSTI 1860 can be achieved by the addition of anionic surfactant (such as soap, sulfonates, sulfates) in quantity equivalent to that of BSTI 1860.

ENVIRONMENTAL HAZARDS

This pesticide is toxic to fish. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans, or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the EPA.

NET CONTENTS: 8, 16, 22, 64 oz., 1, 5, 55, or 300 gal



BioShield™
BioShield Technologies Inc.

BSTI 1860

A Silicone Quaternary Ammonium Salt
FOR MANUFACTURING USE ONLY

ACTIVE INGREDIENT:

3-(trimethoxysilyl) propyldimethyl octadecyl

ammonium chloride.....71.2%

OTHER INGREDIENTS.....28.8%

TOTAL100%

Contains over 12% methanol

KEEP OUT OF REACH OF CHILDREN

DANGER & POISON

(note: above statement will be in RED ink)

Lot No. _____
EPA Reg. No. 70871-12

EPA Est. No. 73189-GA-001

ACCEPTED
with COMMENTS
in EPA Letter Dated:

MAY 30 2002

Under the Federal Insecticide,
Fungicide, and Rodenticide Act as
amended, for the pesticide,
registered under EPA Reg. No. 70871-12

FIRST AID

Have the product container or label with you when calling the poison control center or doctor, or going for treatment.

IF IN EYES:

- Hold eye open and rinse slowly and gently with water for 15-20 minutes.
- Remove contact lenses, if present, after the first 5 minutes, then continue rinsing.
- Call poison control center or doctor for treatment advice.

IF INHALED:

- Move person to fresh air.
- If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth, if possible.
- Call a poison control center or doctor for further treatment advice.

IF SWALLOWED:

- Call a poison control center or doctor immediately for treatment advice.
- Have person sip a glass of water if able to swallow.
- Do not induce vomiting unless told to do so by a poison control center or doctor.
- Do not give anything by mouth to an unconscious person.

IF ON SKIN OR CLOTHING:

- Take off contaminated clothing.
- Rinse skin immediately with plenty of water for 15-20 minutes.
- Call a poison control center or doctor for treatment advice.

NOTE TO PHYSICIAN

Probable mucosal damage may contraindicate the use of gastric lavage.

PRECAUTIONARY STATEMENTS **HAZARDS TO HUMANS AND DOMESTIC** **ANIMALS**

DANGER! Corrosive: Methanol may cause blindness. Causes irreversible eye damage. Harmful or fatal if swallowed. Harmful if inhaled. Do not get in eyes or on clothing. Avoid contact with skin. Avoid breathing vapors or mist. Wear protective eyewear (goggles, face shield or safety glasses). Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet. Remove contaminated clothing and wash clothing before reuse.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. FOR MANUFACTURING USE ONLY

APPROVED USES

BSTI 1880 may be used for incorporation into and treatment of the following substrates to impart bacteriostatic/fungistatic activity:

- Air filters for furnaces, air-conditioners, air purification devices, automobiles, recirculating air handling systems;
- Air filters/materials;
- Aquarium filter material;
- Bed sheets, blankets, and bedspreads;
- Buffer pads (abrasive and polishing);
- Carpets and draperies;
- Concrete additive for sewer pipes, manholes and concrete sewer structures; (Not to be used in treatment of storm drains)
- Concrete additive for repair and renewal of sewer pipes and manholes and concrete sewer structures; (Not to be used in treatment of storm drains)
- Fiberglass for upholstery, sleeping bags, apparel, etc., where the fiber is cotton, natural down, nylon, polyester, rayon, or wool;
- Fiberglass ductboard;
- Fire hose fabric;
- Humidifier bells;

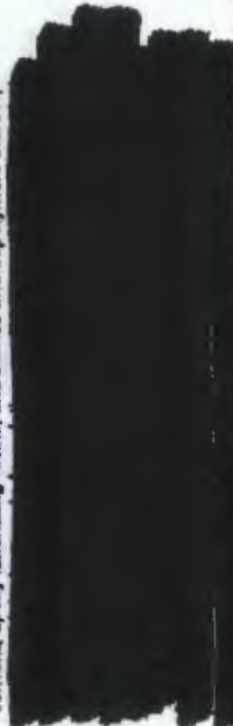
ACCEPTED
with COMMENTS
in EPA Letter Dated:

MAY 30 2002

Under the Federal Insecticide, and Rodenticide Act as
Matress pads and bedspreads, and Rodenticide Act as
Men's underwear and pajamas, for the pesticide,
Non-woven disposable diapered under EPA Reg. No. 70871-12

Under the Federal Insecticide, and Rodenticide Act as
Matress pads and bedspreads, and Rodenticide Act as
Men's underwear and pajamas, for the pesticide,
Non-woven disposable diapered under EPA Reg. No. 70871-12

BSTI 1880 can be used in paints and coatings as an in can preservative for protection of paint film and coating film. Types of paints and coatings include: latex indoor/outdoor paints and stains, woodstains, architectural paints, lacquer and maintenance coatings, films, laminates and finishes including alkyd, urethane, enamel, epoxy, alcohols, amino resins, latex coatings, elastomer coatings, architectural coatings and overcoats, anti-corrosion coatings, fire-resistant coatings, aliphatic coatings, vinyl ester and polyester coatings, gel coatings, amino resins, resins used as additive mixes for cement, epoxy laminating resins, and blends and copolymers thereof.



Polyurethane and cellulose foam for household, industrial, and institutional sponges and mops;

Polyurethane and polyethylene foam, when covered;

Polyurethane foam for packaging and cushioning in non-food contact applications;

Polyurethane foam used as a growth medium for non-food crops and plants;

P-2-moistened towed/diacryl tissue wipes (these do not impart pesticidal properties);

Roofing materials - defined as shingles, roofing granules, wood shakes, felt, stone and synthetic overcoats;

Sand bags, tents, tarpaulins, sails, and ropes;

Athletic and casual shoes;

Shoe insoles;

Shower curtains;

Socks comprised of nylon, nylon/wool, cotton/nylon, linen/Lycra, acrylic/polypropylene/nylon/Lycra

wool/nylon/Lycra and wool/acrylic/nylon/Lycra;

Throw rugs;

Toweling made of 100 percent cotton, 100 percent polyester, and blends of the two fibers;

Toilet tank and seat covers;

Umbrellas;

Upholstery made of acetates, acrylics, cotton, fiberglass, nylon, polyester, polyethylene, polyolefins, polypropylene, rayon, spandex, vinyl, and wool;

- Vacuum cleaner bags and filters;
- Vinyl paper-wallpaper for non-food contact surfaces;
- Disposable wiping cloths that can be used for multiple purposes such as dusting or washing furniture, cars, walls, windows, floors, appliances, dishes, counter tops, etc.; the wiping cloths do not impart pesticide properties;
- Women's hosiery; and
- Women's intimate apparel

For use in formulating products used in residential kitchens and bedrooms on the following hard, non-porous surfaces to impart bacteriostatic/fungistatic activity:

- Tube
- Glazed tile
- Vanity tops
- Shower curtains
- Shower stalls
- Sinks
- Washable walls
- Floors
- Window sills
- Cabinets
- Exterior of refrigerators
- Appliances
- Garbage cans

BSTI 1880

Imparts microbistatic properties.

Provides an invisible microbistatic coating to inhibit the growth of odor causing bacteria.

Provides an invisible microbistatic coating to inhibit the growth of bacteria which cause staining and discoloration.

Provides an invisible microbistatic coating to inhibit the growth of fungi (mold and mildew).

Provides an invisible microbistatic coating to inhibit the growth of algae.

Provides an invisible microbistatic coating to inhibit the growth of odor causing bacteria, bacteria, which cause staining, and discoloration, fungi (mold and mildew), and algae.

Prevents deterioration caused by bacteria and fungi (mold and mildew).

Inhibits deterioration caused by bacteria.

Resists development of microbial odors.

Resists development of stains and discoloration due to bacteria.

Resists development of stains due to fungi (mold and mildew).

Resists stains due to algae.

Resists development of microbial odors, stains and discoloration due to bacteria, fungi (mold and mildew), and algae.

Resists stains due to algae.

Resists development of microbial odors, stains and discoloration due to bacteria, fungi (mold and mildew), and algae.

Provides/creates an invisible barrier to inhibit the growth of odor causing bacteria.

Provides/creates an invisible barrier to inhibit the growth of bacteria, which cause staining, and discoloration.

Provides/creates an invisible barrier to inhibit the growth of fungi (mold and mildew).

Provides/creates an invisible barrier to inhibit the growth of algae.

Provides/creates an invisible barrier to inhibit the growth of odor causing bacteria, bacteria which cause staining and discoloration, fungi (mold and mildew), and algae.

Provides bacteriostatic, fungistatic, (mold and mildew), and algastatic activity.

*Note: Any claims for paint use must be for the preservation of the paint in the can.

IMPORTANT: WARRANTY AND DISCLAIMER INFORMATION

BioShield Technologies, Inc., warrants that the product conforms to its chemical description and is reasonably fit for the purposes stated in this label when used in accordance with directions under normal conditions of use; but this warranty of fitness for a particular purpose does not extend to the use of this product contrary to label instructions, or under abnormal conditions, or under conditions not reasonably foreseeable to seller, and buyer assumes the risk of any such use.

BIOSHIELD SPECIFICALLY DISCLAIMS ANY OTHER EXPRESS OR IMPLIED WARRANTY, INCLUDING THE WARRANTY OF MERCHANTABILITY.

FOR MORE INFORMATION CONCERNING THIS PRODUCT, PLEASE CONSULT THE MATERIAL SAFETY DATA SHEET (MSDS). THE MSDS CAN BE OBTAINED BY WRITING BIOSHIELD TECHNOLOGIES, INC. AT 4405 INTERNATIONAL BOULEVARD, SUITE B109, NORCROSS, GEORGIA, 30093. EMERGENCY TELEPHONE NUMBER (800-424-9300)

ACCEPTED
with COMMENTS
in EPA Letter Dated:

MAY 30 2002

Under the Federal Insecticide,
Fungicide, and Rodenticide Act as
amended, for the pesticide,
registered under EPA Reg. No. 70871-12



SiShield Technologies

Your Antimicrobial Solution

AN ANTIMICROBIAL COMPANY

FACSIMILE TRANSMITTAL SHEET

TO:	Ms. Tracy Lantz	FROM:	Jacques Elfersy
COMPANY:	EPA- Antimicrobial Division	DATE:	10/6/2005
FAX NUMBER:	703-308-8481	TOTAL NO. OF PAGES INCLUDING COVER:	1+1
PHONE NUMBER:		SENDER'S PHONE NUMBER:	404-636-8900
RE:	Donna Weeden - SiShield's Agent	SENDER'S FAX NUMBER:	404-636-8500

☐ URGENT ☐ FOR REVIEW ☐ PLEASE COMMENT ☐ PLEASE REPLY ☐ PLEASE RECYCLE

NOTES/COMMENTS:

Dear Tracy,

Enclosed please find our letter to you authorizing Ms. Donna Weeden to represent SiShield Technologies, Inc.(company EPA No.71751-) as our regulatory agent. Please do not hesitate to call me if you have any questions or need anything else from us. Thank you for your cooperation and assistance.

Best regards,
Jacques Elfersy
404-636-8900 office
404-636-8500 Fax
404-840-9249 Cell

17 Executive Park Drive, Suite 563, Atlanta, Georgia 30326



SiShield Technologies Inc.

17 Executive Park Drive, Suite 563, Atlanta GA 30329
404.636.8900 / 404.636.8500 fax - email: contact_SiShield@msn.net

October 6, 2005

United States Environmental Protection Agency
Washington, D.C. 20460

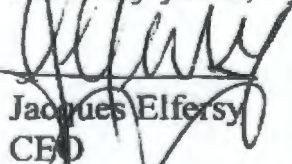
Attention: Ms. Velma Noble / Ms. Tracy Lantz
Regulatory Management Branch 1
Antimicrobial Division (7510C)

Subject: EPA Registration No. 75174-

Dear Velma or Tracy:

This letter is to advise you that Ms. Donna Weeden, formerly known as Ms. Donna Haynes is currently our independent regulatory agent, and is hereby authorized to represent SiShield Technologies, Inc. in preparing and registering a new product registration with the EPA. This product is similar to our previously registered product No. 75174-1, but contains [REDACTED] as a solvent instead of methanol. We look forward to a timely registration, and appreciate your assistance and cooperation in this matter.

Sincerely yours,




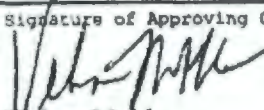
Jacques Elfersy
CEO
SiShield Technologies, Inc.

75174-1

10-20-2003

4/5

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

	U.S. ENVIRONMENTAL PROTECTION AGENCY Office of Pesticide Programs Antimicrobials Division (7510C) 1200 Pennsylvania Avenue, N.W. Washington, D.C. 20460	EPA Reg. Number: 75174-1	Date of Issuance: OCT 22 2003	
	NOTICE OF PESTICIDE: <input checked="" type="checkbox"/> Registration <input type="checkbox"/> Reregistration (under FIFRA, as amended)	Term of Issuance: CONDITIONAL		Name of Pesticide Product: Sis 7200
Name and Address of Registrant (include ZIP Code): SiShield Technologies, Inc. 5555 Glenridge Connector Suite 200 Atlanta, GA 30342				
Note: Changes to the registration of a pesticide must be submitted to the Agency for review. Correspondence should always refer to the registration number.				
On the basis of information furnished by the registrant, the above named pesticide is hereby registered/reregistered under the Federal Insecticide, Fungicide and Rodenticide Act. Registration is in no way to be construed as an endorsement or recommendation of this product by the Agency. In order to protect health and the environment, the Administrator, on his motion, may at any time suspend or cancel the registration of a pesticide in accordance with the Act. The acceptance of any name in connection with the registration of a product under this Act is not to be construed as giving the registrant a right to exclusive use of the name or to its use if it has been covered by others.				
<p style="text-align: center;">This product is conditionally registered in accordance with FIFRA sec. 3(c)(7)(A) provided that you:</p> <ol style="list-style-type: none"> 1. Submit and/or cite all data required for registration of your product under FIFRA sec. 3(c)(5) when the Agency requires all registrants of similar products to submit such data; and submit acceptable responses required for reregistration of your product under FIFRA section 4. 2. Add the phrase EPA Registration Number "EPA Reg. No. 75174-1". 				
Signature of Approving Official:  Velma Noble Regulatory Management Branch 1 Antimicrobial Division (7510C)		Date: OCT 22 2003		

EPA Form 8570-6

CONCURRENCES							
SYMBOL	7510C						
SURNAME	S. Noble						
DATE	10/22/03						

EPA Form 1320-1A (1/80)

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U.S. Government Printing Office: 1992 - 480-680/0057

2/5
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

page 2

EPA Reg. No. 75174-1

3. Make the following revisions to the label:

A. Make a note on the label indicating that DANGER, skull & crossbones, POISON will appear in red ink.

B. Revise the "Approved Uses" as follows:

1. Revise "Exterior wall (such as stone, concrete, brick)" to read "Exterior walls on the outside of architectural structures consisting of stone, concrete, or brick"

2. Add the following language such that your MUP label supports your end use labels: "SiS 7200 can be used in paints and coatings as an in can preservative for protection of paint film and coating film. Types of paints and coatings include: latex indoor/outdoor paints and stains, woodstains, architectural paints, lacquer and maintenance coatings, films laminates and finishes including alkyd, urethane, enamel, epoxy, siloxaline, amino resins, textile coatings, extrusion coatings, architectural coatings and overlays, : anti-corrosion coatings, fire resistant coatings, aliphatic coatings, vinylester and polyester coatings, gel coatings, amino resins, resins used as additive mixes for cement, epoxy laminating resins, and blends and copolymers thereof"

3. Revise "Appliances" to read "Exterior Surfaces of Appliances"

4. Delete the abbreviation "etc." in the two instances where it appears in the Approved Uses section. Delete from the statements beginning: "Fiberfill for upholstery..." and "Disposable wiping cloths..."

C. Add the following statement to this label: "Note: Any claims for paint use must be for the preservation of the paint in the can."

4. The following comments apply to the formulations submitted to support this registration.

A. The Basic Formulation which contains 12% methanol dated 8/28/03 is acceptable. This is the only Basic Formulation accepted. (Note: Only one basic formula is accepted for any product. Any additional formulas are submitted as alternate formulations.)

The Alternate Formulation, which does not include methanol, dated 8/28/03 is unacceptable. This alternate formula is not be in agreement with the toxicity statement on the accepted label for this product. The toxicity would change for this formulation, i.e. the word POISON, skull & crossbones, and may cause blindness would not be necessary. The product as registered contains methanol. All product containing > 4% methanol require this toxicity language. A formulation without methanol must be submitted as a separate registration.

CONCURRENCES					
SYMBOL	B. The Agency has corrected the CAS number for your active ingredient. Make the same correction to the Confidential Statement of Formula in your files. Correct to read: 27668-52-6				
SURNAME					
DATE					

SiS 7200 is cancelled
now works to
also register
product w/o
methanol

Inert ingredient information may be entitled to confidential treatment

3/5

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

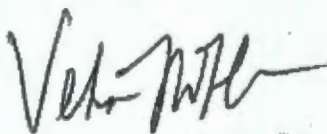
page 3
EPA Reg. No. 75174-1

If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA sec. 6(e). Your release for shipment of the product constitutes acceptance of these conditions.

A stamped copy of the label is enclosed for your records. Submit one (1) copy of the final printed label prior to the release of the product for shipment.

If you have any questions concerning this letter, please contact Tracy Lantz at (703) 308-6415.

Sincerely,



Velma Noble
Product Manager 31
Regulatory Management Branch 1
Antimicrobial Division (7510C)

Enclosure: stamped label
7510C:T.Lantz:10/22/03:75174-1

CONCURRENCES							
SYMBOL							
SURNAME							
DATE							

STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage and disposal.

Pesticide Storage: Store in original closed containers in a secure area inaccessible to children and away from food or feed.

Pesticide Disposal: Pesticide wastes are toxic. Improper disposal of excess pesticide, spray mixture or rinsate is a violation of Federal law. If these wastes cannot be disposed of by use according to the label instructions, contact your State Pesticide or Environmental Control Agency or the Hazardous Waste Representative at the nearest EPA regional office for guidance.

Container Disposal: (plastic) Triple rinse (or equivalent), then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or incineration or, if allowed by state and local authorities, by burning. If burned, stay out of smoke. (metal) Triple rinse (or equivalent), then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or incineration or, other procedures approved by state and local authorities. (glass) Triple rinse (or equivalent), then dispose of in a sanitary landfill or by other approved State and local procedures.

PHYSICAL OR CHEMICAL HAZARDS

Combustible. Do not use or store near heat or open flame. De-activation of SIS 7200 can be achieved by the addition of anionic surfactant (such as soap, sulfonates, sulfates) in quantity equivalent to that of SIS 7200.

ENVIRONMENTAL HAZARDS

This pesticide is toxic to fish. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans, or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the EPA.

NET CONTENTS: 8, 16, 22, 64 oz; 1, 5, 55, or 300 gal



SiShield Technologies Inc.

5555 Clearidge Connector, suite 200, Atlanta GA 30342

404.531.5090 / 404.531.5091 fax -

email: contact_SiShield@msn.net

SIS 7200

A Silicone Quaternary Ammonium Salt
FOR MANUFACTURING USE ONLY

ACTIVE INGREDIENT:

3-(trimethoxysilyl) propyldimethyl octadecyl
ammonium chloride.....72.0%

OTHER INGREDIENTS:.....28.0%

TOTAL100%

Contains over 12% methanol

**KEEP OUT OF REACH OF CHILDREN
DANGER & POISON**

Lot No. _____
EPA Reg. No. 75174-

EPA Est. No. Xxxxx-xxx

FIRST AID

Have the product container or label with you when calling the poison control center or doctor, or going for treatment.

IF IN EYES:

- Hold eye open and rinse slowly and gently with water for 15-20 minutes.
- Remove contact lenses, if present, after the first 5 minutes, then continue rinsing.
- Call poison control center or doctor for treatment advice.

IF INHALED:

- Move person to fresh air.
- If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth, if possible.
- Call a poison control center or doctor for further treatment advice.

IF SWALLOWED:

- Call a poison control center or doctor immediately for treatment advice.
- Have person sip a glass of water if able to swallow.
- Do not induce vomiting unless told to do so by a poison control center or doctor.
- Do not give anything by mouth to an unconscious person.

IF ON SKIN OR CLOTHING:

- Take off contaminated clothing.
- Rinse skin immediately with plenty of water for 15-20 minutes.
- Call a poison control center or doctor for treatment advice.

NOTE TO PHYSICIAN

Probable mucosal damage may contraindicate the use of gastric lavage.

RECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS

DANGER! Corrosive: Methanol may cause blindness. Causes irreversible eye damage. Harmful or fatal if swallowed. Harmful if inhaled. Do not get in eyes or on clothing. Avoid contact with skin. Avoid breathing vapors or mist. Wear protective eyewear (goggles, face shield or safety glasses). Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet. Remove contaminated clothing and wash clothing before reuse.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. **FOR MANUFACTURING USE ONLY.**

OCT 22 2005
Under the Federal Insecticide,
Fungicide, and Rodenticide Act as
amended, for the pesticide
registered under EPA Reg. No. 75174-1

APPROVED USES

SIS 7200 may be used for incorporation into and treatment of the following substrates to impart bacteriostatic/fungistatic activity:

- Air filters for furnaces, air-conditioners, air purification devices, automobiles, recirculating air handling systems;
- Air filter/materials;
- Aquarium filter materials;
- Bed sheets, blankets, and bedspreads;
- Buffer pads (abrasive and polishing);
- Carpets and draperies;
- Concrete additive for sewer pipes, manholes and concrete sewer structures; (not to be used in treatment of storm drains)
- Concrete additive for repair and renewal of sewer pipes and manholes and concrete sewer structures; (not to be used in treatment of storm drains)
- Exterior wall (such as stone, concrete, brick)
- Fiberglass for upholstery, sleeping bags, apparel, etc., where the fiber is cotton, natural down, nylon, polyester, rayon, or wool;
- Fiberglass ductboard;
- Fire hose fabric;
- Humidifier belts;
- Mattress pads and ticking;
- Men's underwear and outerwear;
- Non-woven disposable diapers;
- Outerwear apparel;
- Polyurethane and cellulose foam for household, industrial, and institutional sponges and mops;
- Polyurethane and polyethylene foam, when covered;
- Polyurethane foam for packaging and cushioning in non-food contact applications;
- Polyurethane foam used as a growth medium for non-food crops and plants;
- Pre-moistened towels and tissue wipes (these do not impart pesticidal properties);
- Roofing materials - defined as shingles, roofing granules, wood shakes, felt, stone and synthetic overcoats;
- Sand bags, tents, tarpaulins, sails, and ropes;
- Athletic and casual shoes;
- Shoe insoles;
- Shower curtains;
- Socks comprised of nylon, rayon/nylon, cotton/nylon, linen/Lycra, acrylic/polypropylene/nylon/Lycra wool/silk/nylon/Lycra and wool/acrylic/nylon/Lycra;
- Throw rugs;

Provides/creates an invisible barrier to inhibit the growth of fungi (mold and mildew).
Provides/creates an invisible barrier to inhibit the growth of algae.
Provides/creates an invisible barrier to inhibit the growth of odor causing bacteria, bacteria which cause staining and discoloration, fungi (mold and mildew), and algae.
Provides bacteriostatic, fungistatic, (mold and mildew), and algicidal activity.

IMPORTANT: WARRANTY AND DISCLAIMER INFORMATION

SISShield Technologies, Inc., warrants that the product conforms to its chemical description and is reasonably fit for the purposes stated in this label when used in accordance with directions under normal conditions of use; but this warranty of fitness for a particular purpose does not extend to the use of this product contrary to label instructions, or under abnormal conditions, or under conditions not reasonably foreseeable to seller, and buyer assumes the risk of any such use.

SISSHIELD SPECIFICALLY DISCLAIMS ANY OTHER EXPRESS OR IMPLIED WARRANTY, INCLUDING THE WARRANTY OF MERCHANTABILITY.

FOR MORE INFORMATION CONCERNING THIS PRODUCT, PLEASE CONSULT THE MATERIAL SAFETY DATA SHEET (MSDS). THE MSDS CAN BE OBTAINED BY WRITING SISSHIELD TECHNOLOGIES, INC. AT 5555 GLENRIDGE CONNECTOR, SUITE 200, ATLANTA, GEORGIA, 30342. EMERGENCY TELEPHONE NUMBER (800-424-9300)

- Yarn/welting made of 100 percent cotton, 100 percent polyester, and blends of the two fibers;
 - Toilet tank and seat covers;
 - Umbrellas;
 - Upholstery made of acetates, acrylics, cotton, fiberglass, nylon, polyester, polyethylene, polyolefins, polypropylene, rayon, spandex, vinyl, and wool;
 - Vacuum cleaner bags and filters;
 - Vinyl paper-wallpaper for non-food contact surfaces;
 - Disposable wiping cloths that can be used for multiple purposes such as dusting or washing furniture, cars, walls, windows, floors, appliances, dishes, counter tops, etc.; the wiping cloths do not impart pesticide properties;
 - Women's hosiery; and
 - Women's intimate apparel
- For use in formulating products used in residential kitchens and bedrooms on the following hard, non-porous surfaces to impart bacteriostatic/fungistatic activity:

- Tubs
- Glazed tile
- Vanity tops
- Shower curtains
- Shower stalls
- Sinks
- Washable walls
- Floors
- Window sills
- Cabinets
- Exterior of refrigerators
- Appliances
- Garbage cans

SIS 7200

- Imparts microbiostatic properties.
- Provides an invisible microbiostatic coating to inhibit the growth of odor causing bacteria.
- Provides an invisible microbiostatic coating to inhibit the growth of bacteria which cause staining and discoloration.
- Provides an invisible microbiostatic coating to inhibit the growth of fungi (mold and mildew).
- Provides an invisible microbiostatic coating to inhibit the growth of algae.
- Provides an invisible microbiostatic coating to inhibit the growth of odor causing bacteria, bacteria, which cause staining, and discoloration, fungi (mold and mildew), and algae.
- Prevents deterioration caused by bacteria and fungi (mold and mildew).
- Inhibits deterioration caused by bacteria.
- Resists development of microbial odors.
- Resists development of stains and discoloration due to bacteria.
- Resists development of stains due to fungi (mold and mildew).
- Resists stains due to algae.
- Resists development of microbial odors, stains and discoloration due to bacteria, fungi (mold and mildew), and algae.
- Provides/creates an invisible barrier to inhibit the growth of odor causing bacteria.
- Provides/creates an invisible barrier to inhibit the growth of bacteria, which cause staining, and discoloration.



Just Me
<weedenati2004@yahoo.com>

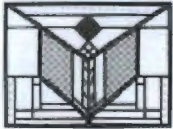
12/09/2005 09:12 AM

To Tracy Lantz/DC/USEPA/US@EPA
cc
bcc
Subject fax issued for SiS 7200 (75174-U)

Hello Tracy,
I sent the requested information for the product noted above to you via fax last night. Can you please respond to this email or call me to let me know that you have received the fax and all requested information is adequate. If I need to submit something else or if the information is not sufficient, please contact me immediately at 770-513-3906. I look forward to hearing from you.

Regards,
Donna Weeden
Regulatory Agent

Do You Yahoo!?
Tired of spam? Yahoo! Mail has the best spam protection around
<http://mail.yahoo.com>



Tracy Lantz/DC/USEPA/US

11/18/2005 02:05 PM

To Velma Noble/DC/USEPA/US

cc

bcc

Subject PRIA 75174-U

You gave me a package for this product to be presented at PRIA. All I received is a copy of the cover letter and the chemistry data. I do not have labels, CSF, data matrix, application for pesticide, etc.

Please let me know if you find the rest of this information. I have also contacted the consultant. I am confident that at least some of this information was sent in with the original package. The fee has not been paid and the pin punch is 11/2/05. I received this when I returned to the office on the 16th.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

November 7, 2005

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

SISHIELD TECHNOLOGIES, INC.
5555 GLENRIDGE CONNECTOR, SUITE 200
ATLANTA, GA 30342

Report of Analysis for Compliance with PR Notice 86-5

Thank you for your submittal of 02-NOV-05. Our staff has completed a preliminary analysis of the material. The results are provided as follows:

Your submittal was found to be in full compliance with the standards for submission of data contained in PR Notice 86-5. A copy of your bibliography is enclosed, annotated with Master Record ID's (MRIDs) assigned to each document submitted. Please use these numbers in all future references to these documents. Thank you for your cooperation. If you have any questions concerning this data submission, please raise them with the cognizant Product Manager, to whom the data have been released.

Receipt for Section 3

S: 786185

Regulatory Type: ☐ Yes ☐ No

Regulatory Type: Product Registration - Section 3

Fee For Service: ☐ Yes ☐ No

Application Type: New Registration

Billable: ☐ Yes ☐ No

Company: 75174 SISHELD TECHNOLOGIES, INC.

V

Risk Manager: Antimicrobials Division, Risk Management Team 31

Product #: 75174-U Product Name: SIS 7200

Me Too

Section 3:

Me Too

Product Name:

Application Date: 31-Oct-2005

ORP Rec'd Date: 02-Nov-2005

Front End Date: 03-Nov-2005

Risk Manager Send Date:

FFS Due Date:

Negotiated Due Date:

ORP Target Date:

Fast Track: ☐

New Ingredient: ☐

Receipt Description:

Me-too application for manufacturing use product registration.

New Ingredient

Request Date:

New Ingredient

Received Date:

Signature Date:

Signature Date:

Signature Date:

Signature Date:

Print Letter

Enter More Information

Tracking

Receipt Content:

Study

TRANSMITTAL DOCUMENT

SUBMITTER

SiShield Technologies, Inc.
17 Executive Park Drive, Suite 563
Atlanta GA 30329

Donna Weeden*
310 Twin Brook Way
Lawrenceville, GA 30043

*Donna Weeden is the independent regulatory agent for SiShield Technologies, Inc.

Regulatory action in support of which this package is submitted:

Application for renewal of pesticide registration for
SiS 7200 (EPA Symbol file no. 75174-1)

Transmittal Date

31 October 2005

Contents

	Volume 1	Administrative Materials
46682901	Volume 2	Beginning Materials and Manufacturing Process and Discussion of the Formation of Impurities (OPPTS 830.1550, 830.1620, 830.1670: Guidelines 61-1, 61-2, 61-3)
46682902	Volume 3	Preliminary Analysis (Guideline 62-1; OPPTS 830.1700)
46682903	Volume 4	Certified Limits (Guideline 62-2; OPPTS 830.1750)

Company Regulatory Agent: Donna M. Weeden

Donna Weeden 31 Oct 2005

Company Regulatory Contact: 770-513-3906 / 404-271-7925



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

November 16, 2005

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

PLEASE RETURN A COPY OF THIS LETTER WITH PAYMENT

OPP Decision Number: D-362263
EPA File Symbol or Registration Number: 75174-U
Product Name: SIS 7200
EPA Receipt Date: 02-Nov-2005
EPA Company Number: 75174
Company Name: SISHIELD TECHNOLOGIES, INC.

Donna Weeden
SISHIELD TECHNOLOGIES, INC.
17 executive Park Drive, Suite 563
ATLANTA, GA 30329

SUBJECT: Receipt of Registration Application Subject to Registration Service Fee

Dear Registrant:

The Office of Pesticide Programs has received your application for registration. If you submitted data with this application, the results of the PRN-86-5 screen will be communicated separately. During the administrative screen, the Office of Pesticide Programs has determined that this Action is subject to a Pesticide Registration Service Fee as defined in the Pesticide Registration Improvement Act.

The Action has been identified as Action Code: A53

ME-TOO;NEW PRODUCT;FAST TRACK;

Please remit payment in the amount of: \$ 1,050 to:

By USPS:
USEPA Washington Finance Center
Pesticide Registration Service Fee
PO Box 360277
Pittsburgh, PA 15251

By Courier:

U.S. EPA Washington Finance Center
Pesticide Registration Service Fee
C/O Mellon Client Service Center
500 Ross Street, Room 670
Box 360277
Pittsburgh, PA 15251-6277
Attn: EPA Module Supervisor
Telephone: (412) 236-2294

All payments must be in United States currency by check, bank draft, or money order drawn to the order of the Environmental Protection Agency. To ensure proper credit, please write the OPP DECISION NUMBER on your check, and enclose a copy of this letter with your payment.

You may be eligible for a full or partial waiver of the registration service fee if, for example, you qualify as a small business or are applying for a minor use, or if your application is solely associated with an IR-4 tolerance petition. Please be advised that if you intend to request a waiver, you must do so in writing within 15 days of receipt of this invoice instead of remitting the amount indicated above. OPP will not consider waiver requests after the registration service fee has been paid. Information regarding eligibility and how to request and document a fee waiver is available on the OPP Fee for Service web site at www.epa.gov/pesticides/fees.

Please send Registration Service Fee Waiver requests to:

By USPS:

Document Processing Desk (WAIVER)
Office of Pesticide Programs (7504C)
U.S. Environmental Protection Agency
1200 Pennsylvania Ave NW
Washington, DC 20460

By Courier:

Document Processing Desk (WAIVER)
Office of Pesticide Programs (7504C)
U.S. Environmental Protection Agency
Room 266A, Crystal Mall #2
1801 S. Bell St.
Arlington, VA 22202

A PRIA decision time review period will not start until a fee waiver is granted and/or the Agency receives certification that the outstanding fee has been paid. If the Agency does not receive certification of payment for this action or a fee waiver request within the next 45 days, the Agency will presume that you no longer want to pursue this action. The Agency will then initiate a process that may result in administrative withdrawal of this action.

If you have any questions, please contact the Pesticide Registration Service Fee Ombudsman at (703) 308-6432.

Sincerely,



Front End Processing Staff
Information Technology & Resources Management Division



SiShield Technologies Inc.

17 Executive Park Drive, Suite 563, Atlanta GA 30329
404.636.8900 / 404.636.8500 fax – email: contact_SiShield@msn.net

Ms. Velma Noble
Product Manager 31
Antimicrobials Division (7510W)
U.S. Environmental Protection Agency
Document Processing Desk (APPL)
Room 226A, Crystal Mall 2
1801 South Bell Street
Arlington, VA 22202-4501

31 Oct 2005

VIA FEDERAL EXPRESS

RE: SiShield Technologies, Inc. Product Renewal Registration for SiS 7200 (EPA Registration No. 75174-1) Re-submission of Application for "Me-too" Product Registration.


Dear Ms. Noble:

On behalf of SiShield Technologies, Inc. I am resubmitting a me-too application for a new MUP product SiS 7200 (EPA Registration No. 75174-1). The registration of this product was suspended in July 2005; therefore the same information in support of the registration is being resubmitted.

The product is substantially similar to BioShield Technologies' BSTI 1860 (trimethoxysilyl) propyl dimethyl octadecyl ammonium chloride (CPTMS: CAS #27668-52-6), EPA Registration No 70871-12. SiShield Technologies is submitting its own product chemistry and is relying on the cite all method of support for all other required data. Letters have been sent by certified mail offering to pay compensation to related companies listing for CPTMS on the Data Submitters List.

As per PR Notice 86-5, five copies of the draft label for the basic formulation are included. We look forward to an expedited review as the same information is being submitted to support the renewal of the registration for SiS 7200 (EPA Registration No. 75174-1).

Sincerely,


Donna Weeden
Regulatory Agent

Enclosures

SiShield Technologies, Inc.
17 Executive Park Drive, Suite 563, Atlanta GA 30329
404.636.8900 / 404.636.8500 fax



TRANSMITTAL DOCUMENT

SUBMITTER

SiShield Technologies, Inc.
17 Executive Park Drive, Suite 563
Atlanta GA 30329

Donna Weeden*
310 Twin Brook Way
Lawrenceville, GA 30043

*Donna Weeden is the independent regulatory agent for SiShield Technologies, Inc.

Regulatory action in support of which this package is submitted:

Application for renewal of pesticide registration for
SiS 7200 (EPA Symbol file no. 75174-1)

Transmittal Date

31 October 2005

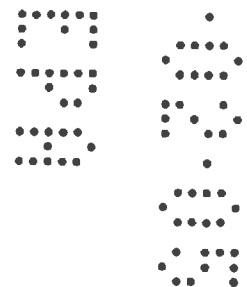
Contents

- Volume 1 Administrative Materials**
- Volume 2 Beginning Materials and Manufacturing Process and Discussion of the
Formation of Impurities (OOPTS 830.1550, 830.1620, 830.1670:
Guidelines 61-1, 61-2, 61-3)**
- Volume 3 Preliminary Analysis (Guideline 62-1; OPPTS 830.1700)**
- Volume 4 Certified Limits (Guideline 62-2; OPPTS 830.1750)**

Company Regulatory Agent: Donna M. Weeden

Company Regulatory Contact: 770-513-3906 / 404-271-7925

Donna Weeden 31 Oct 2005





Please read instructions on reverse before completing form.

Form Approved. OMB No. 2070-0060



United States
Environmental Protection Agency
Washington, DC 20460

☒ Registration
☐ Amendment
☐ Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 75174- <i>IL</i>	2. EPA Product Manager Velma Noble	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) SiS 7200	PM# 31	
5. Name and Address of Applicant (Include ZIP Code) SiShield Technologies, Inc. 17 Executive Park Drive, Suite 563 Atlanta, GA 30329 <input checked="" type="checkbox"/> Check if this is a new address		6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. 70871-12 Product Name BSTI 1860

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input checked="" type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input checked="" type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Me-Too application for manufacturing use product registration. This product application for registration was previously submitted in June 2003. This new submission is due to the cancellation of the registration of 75174-1.

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input checked="" type="checkbox"/> Metal <input checked="" type="checkbox"/> Plastic <input checked="" type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____		
* Certification must be submitted		If "Yes" Unit Packaging wgt.	No. per container	If "Yes" Package wgt.	No. per container
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container 8 oz., 16 oz., 22 oz., 64 oz., 1 gal, 5 gal, 55 gal, 300 gal		5. Location of Label Directions <input checked="" type="checkbox"/>	
6. Manner in Which Label is Affixed to Product		<input checked="" type="checkbox"/> Lithograph Paper glued Stenciled <input type="checkbox"/> Other _____			

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name Dr. Marcello Vilahoz / Donna Weeden	Title President SiShield Technologies / Regulatory Agent	Telephone No. (Include Area Code) 404-636-8900 / 770-513-3906
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		8. Date Application Received (Stamped)
2. Signature 	3. Title President	
4. Typed Name Marcelo Vilahoz, Ph.D.	5. Date 10/31/05	

